

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

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**APPEAL FROM RICHLAND COUNTY  
Court Of Common Pleas**

74339

**The Honorable Jeannette McBride, Judicial Circuit Court Judge  
Case No.: 2012-CP-40-7392**

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**Appellate Case No. 2014-001728**

**Frank "Doc" Haynie.....Appellant,**

**v.**

**The City of Forest Acres, Mark M. Williams, Shaun Greenwood and Clark Frady  
in their individual capacities, Of Whom Travelers Insurance Company .....  
Respondents.**

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**RESPONDENT THE CITY OF FOREST ACRES' MOTION FOR  
EXTENSION OF TIME**

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Respondent City of Forest Acres respectfully requests a thirty (30) day extension of time to submit their initial briefs Brief and Designation pursuant to Rule 240, SCRPC. We are requesting an extension due to current case load and upcoming deadlines in state and federal court. We also request that the thirty (30) day extension apply to all Respondents to provide coordination of deadlines. The Appellant consents to this request.

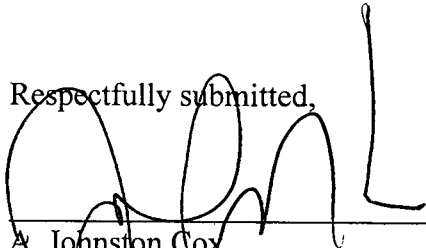
*- Signature page to follow -*

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Respectfully submitted,

  
A. Johnston Cox  
GALLIVAN, WHITE & BOYD, P.A.  
Post Office Box 7368  
Columbia, South Carolina 29202  
Tel: 803.779.1833  
Fax: 803.779.1767

ATTORNEYS FOR CITY OF FOREST ACRES

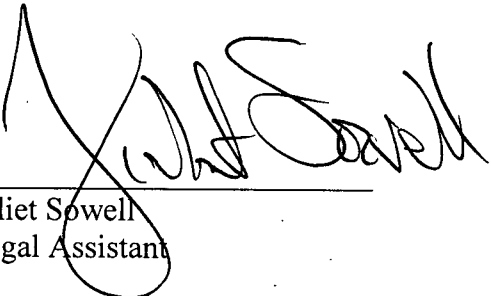
December 1, 2014

**Certificate of Service**

I certify that on this 1<sup>st</sup> day of December, 2014, a copy of Respondents City of Forest Acres's Motion for Extension of Time was served on Appellant and all other counsel for the Record by depositing said copy in the U.S. Mail, with sufficient first class postage, addressed as listed below:

J. Lewis Cromer  
J. Lewis Cromer & Associates  
1522 Lady Street  
Columbia, SC 29201

Kirby D. Shealy  
Ellis Lawhorne  
1501 Main Street, 5th Floor  
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Juliet Sowell  
Legal Assistant

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December 1, 2014

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

In re: Frank "Doc" Haynie v. The City of Forest Acres, et al.  
Civil Action No.: 2012-CP-40-7392  
GWB File No.: 1948-125

Dear Madam Clerk:

Enclosed please find our Motion for an Extension of Time to submit the Initial Brief and Designation of Respondent City of Forest Acres until December 30, 2014. We also request that our Motion apply to all Respondents in the interest of coordinated deadlines. I am also enclosing our firm check in the amount of \$25.00 for the filing fee. Thank you for your consideration of this request.

Thank you for your consideration of this request. I look forward to hearing from you

With kind regards, I am,

Very truly yours,

GALLIVAN, WHITE & BOYD, P.A.

A. Johnston Cox

AJC/jrbs  
Enclosure

cc: J. Lewis Cromer  
Kirby D. Shealy, III

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**Gallivan, White & Boyd, P.A.**

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