

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
Case No.: 2011-CP-07-04548

Appellate Case No.: 2014-001862

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SC Court of Appeals

14374

Theophilus Hamilton.....Appellant,

vs.

Beaufort County Sheriff's Office.....Respondent.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF
AND DESIGNATION OF MATTER

The Respondent, Beaufort County Sheriff's Office, respectfully requests an extension of time to file Respondent's Initial Brief and Designation of Matter. If the motion is granted, the Initial Brief would be due at least thirty (30) days from the date of the Order Granting the Motion for Extension of Time. The Undersigned requested a copy of a portion of the transcript taken on August 4, 2014 from the court reporter at the jury trial of the case. This request was made on October 7, 2014. (A copy of the request is attached as Exhibit A) The relevant portion of the transcript may contain information relative to an argument to be made in the Brief of the Respondent. Until we receive a copy of that transcription, the Respondent cannot determine what information and argument

the brief should contain. We have followed up recently with the court reporter but have not received word regarding the transcript. Therefore, additional time is needed to complete the Initial Brief.

HOWELL, GIBSON & HUGHES, P.A.

By: 

Mary Bass Lohr
Post Office Box 40
Beaufort, SC 29901
(843) 522-2400
Attorney for Respondent

Beaufort, South Carolina

December 4, 2014

Darden, Ashley

From: Ashley Darden
Sent: 10/7/2014 09:21 AM
To: mmanley@sccourts.org
CC:
BCC:

Attachments:

Priority: Normal
Request: None
Security: Normal
Deliver After 0 days(s)
Subject: CIVIL ACTION NO: 2011-CP-07-04548 {Matter No.[11007 MBL]}{Hamilton vs. Beaufort County Sheriff's Department}

Ms. Manley,

Mary Lohr is looking for a conversation held with Plaintiff counsel in connection with the above referenced matter. Therefore, I am hoping that you can provide us with a transcript of any pre-trial proceedings. The trial commenced on Monday, August 4, 2014 before Judge Goldsmith. She will not need any of the actual trial, but whatever you have before the trial began. I hope that makes sense. Please feel free to contact us with any questions or should you need any additional information.

Thanks,

Ashley Darden

Legal Assistant to Patrick M.

Higgins and Mary Bass Lohr

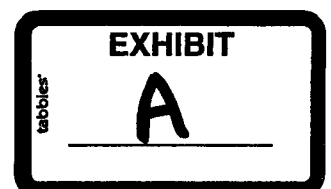
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South Carolina Court of Appeals

APPEAL FROM BEAUFORT COUNTY
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Theophilus Hamilton.....Appellant,

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has served the foregoing Motion for Extension of Time to file Initial Brief and Designation of Matter upon all counsel of record by affixing same with proper postage and placing same with the United States Postal Service on the 4th day of December, 2014 addressed to the following:

Eric J. Erickson, Esquire
Attorney at Law
2015 Boundary Street, Suite 309
Beaufort, SC 29902

SIGNATURE PAGE FOLLOWS

HOWELL, GIBSON & HUGHES, P.A.

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Attorney for Respondent

Beaufort, South Carolina

December 4, 2014

HOWELL, GIBSON AND HUGHES, P.A.
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J. ANDREW YOHO

JAMES S. GIBSON, JR *
Of Counsel

* Certified Mediator

December 4, 2014

(Via Federal Express: 7720 8747 4014)
Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

Re: Theophilus Hamilton vs. The Beaufort County Sheriff's Office
Civil Action No.: 2014-001862
Our File No: 11007 MBL

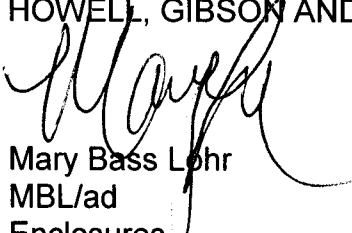
Dear Ms. Kitchings:

Please find enclosed herewith for filing an original and six (6) copies of the Respondent's Motion for Extension of Time to file Initial Brief and Designation of Matter with regard to the above referenced matter. I would appreciate your filing the same and returning a filed clocked copy to me in the enclosed self-addressed, stamped envelope provided for your convenience.

With kindest regards, I am

Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.


Mary Bass Lohr
MBL/ad
Enclosures

cc: Eric J. Erickson (Via U.S. Mail Only)

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SC Court of Appeals

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SC Court of Appeals

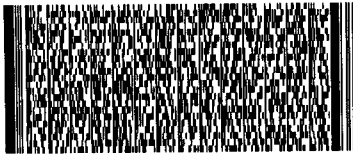
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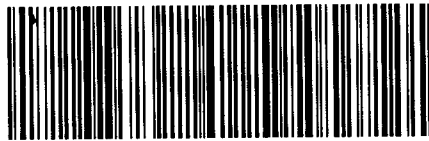
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