

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

APR 06 2015

Edgar W. Dickson, Circuit Court Judge

SC Court of Appeals

Case No. 2011-CP-38-1397

William Breland, Respondent,

v.

South Carolina Department of Transportation, Appellant.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, the Respondent requests a 15-day extension of the deadline for filing and serving his initial brief and designation of matter in this case. The current deadline is April 6, 2015. This is the fourth extension request for this deadline.

Respondent's counsel proffers the following grounds as good cause for this request:

1. Appellant's counsel serves on the South Carolina Board of Law Examiners. The Board is currently in the process of grading the exams from the February 2015 Bar Exam and those deadlines are immutable.
2. Appellant's counsel is acting as special counsel for the South Carolina House of Representatives and is advising the House Ethics Committee. The Committee has required legal counsel on an unexpected number of matters since the General Assembly returned to session in January 2015. This has required counsel's presence

at the Legislature for an unexpected amount of time.

Accordingly, Respondent requests that the Court find good cause for extending the deadline to file the Initial Brief of Respondent and designation of matter to be included in the Record on Appeal.

April 6 2015

Respectfully Submitted,



John S. Nichols, SC Bar # 4210

Blake A. Hewitt, SC Bar # 73674

BLUESTEIN NICHOLS

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Attorneys for Respondent

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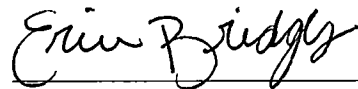
South Carolina Department of Transportation, Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellant with a copy of the *Motion for Extension* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Richard B. Ness
Alison D. Hood
Norma Anne Turner Jett
Adam C. Ness
NESS & JETT, LLC
P.O. Box 909
Bamberg, SC 29003

April 6, 2015



Erin Bridges
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

April 6, 2015

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SC Court of Appeals

VIA HAND DELIVERY

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

RE: William Breland v. South Carolina Department of Transportation
Case Tracking No.: 2014-000168

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to the above matter. I have also enclosed a proof of service of this document on counsel for the Appellant and a \$25.00 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges

Paralegal to John S. Nichols
BLUESTEIN, NICHOLS, THOMPSON &
DELGADO, LLC

/emb

Enclosures

cc: J. Christopher Wilson, Esquire
Richard B. Ness, Esquire
Alison D. Hood, Esquire
Norma Anne Turner Jett, Esquire
Adam C. Ness, Esquire