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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APR 17 2015

SC Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas  
Case No. 2014-CP-46-2643

John C. Hayes, III, Circuit Court Judge

Appellate Case No 2014-002286

The City of Rock Hill, Appellant,


v.

James Delaney Allen, III, Respondent

MOTION FOR EXTENSION OF TIME

Michael L. Brown, Jr., attorney for Respondent, James Allen, received the Initial Brief of Appellant in this matter on March 18, 2015. Mr. Brown moves this Court seeking an extension of time for filing the Initial Brief of the Respondent based upon the following good cause: Mr. Brown has a large number of active cases requiring his attention. On March 25, 2015 Mr. Brown's paralegal experienced the death of her child and has been out of work since that date. On March 27, 2015 Mr. Brown's girlfriend was involved in an accident and hospitalized.

April 14, 2015

  
\_\_\_\_\_  
Michael L. Brown, Jr  
Post Office Box 1025  
Rock Hill, SC 29731  
(803) 328-8822  
Attorney for Appellant

Other Counsel of Record:  
Christopher E. Barton  
Senior City Solicitor  
201 E. Main St , 3<sup>rd</sup> Floor  
Rock Hill, SC 29730  
(803) 329-5641  
Attorney for Appellant

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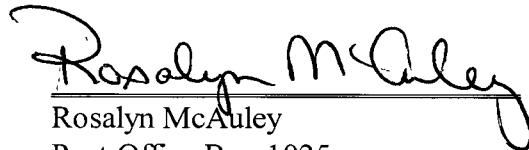
James Delaney Allen, III,

Respondent.

PROOF OF SERVICE

I certify that I have served the MOTION FOR EXTENSION OF TIME on Christopher E Barton by depositing a copy of it in the United States Mail, postage prepaid, on April 14, 2015, addressed to him at 201 E. Mam St , 3<sup>rd</sup> Floor, Rock Hill, SC 29730.

April 14, 2015

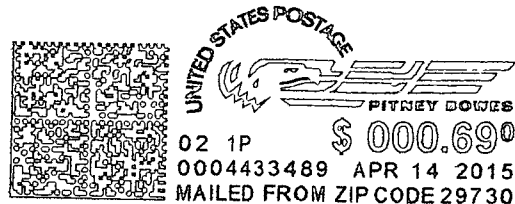


Rosalyn McAuley  
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(803) 328-8822  
Paralegal to Michael L. Brown

Michael L. B

P.O. Box 10

Rock Hill, SC 29731



The Honorable Jenny Abbott Kutchings  
Clerk, South Carolina Court of Appeals

P.O. Box 11629

Columbia, SC 29211

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