

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal from Greenville County  
Honorable Alison Renee Lee, Circuit Court Judge  
Appellate Case No. 2014-002105

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MICHAEL EDWARD SCHULZ,

APPELLANT,

vs.

CITY OF GREER,

RESPONDENT.

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**MOTION FOR SECOND EXTENSION OF TIME WITHIN WHICH  
TO SERVE AND FILE THE INITIAL BRIEF OF APPELLANT AND  
DESIGNATION OF MATTER**

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Appellant (“Michael Edward Schulz”), through his undersigned counsel, would respectfully show unto the Court as follows:

**I.**

The Initial Brief of Appellant and Designation of Matter were due to be served and filed March 30, 2015. However, due to an extraordinary case load, as the exit of two associate attorneys has counsel for Appellant covering unexpected additional matters, and other cases pending before this Court, Circuit Courts and Summary Courts, I am unable, without undertaking an extremely heavy burden, to complete the Brief on time. The undersigned counsel apologizes for any inconvenience this request has caused the Court and to the Respondent and does not believe this request will result in any prejudice to the petitioner should it be granted.

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II.

This extension request is not intended for purposes of delay, but rather to ensure that the Brief is properly researched and prepared. I would therefore ask this Court to accept the Appellant's motion for an extension of time and grant an extension of time within which to file the Initial Brief of Appellant and Designation of Matter.

**WHEREFORE**, Appellant prays that the Court grant the Appellant's Motion for Second Extension of Time Within Which to Serve and File the Initial Brief of Appellant and Designation of Matter in this case for thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

By: 

DANIEL J. FARNSWORTH, JR.  
Attorney for Appellant  
Farnsworth Law Offices, LLC  
2 Williams Street  
Greenville, South Carolina 29601  
(864) 250-9119

# FARNSWORTH LAW OFFICES, LLC

ATTORNEYS AND COUNSELORS AT LAW

2 WILLIAMS STREET  
POST OFFICE BOX 8719  
GREENVILLE, SOUTH CAROLINA 29604

DANIEL J. FARNSWORTH, JR.\*

\* ALSO ADMITTED TO PRACTICE IN VIRGINIA

TELEPHONE: 864.250.9119  
FACSIMILE: 864.250.9120

March 26, 2015

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

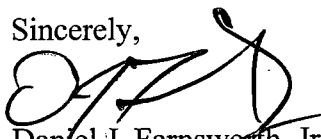
**Re: City of Greer v Michael Edward Schulz**  
**Appellate Case Number: 2014-002105**

To The Honorable Jenny Abbott Kitchings,

Please find enclosed the original and six (6) copies of the Motion for Second Extension of Time Within Which to Serve and File the Initial Brief of Appellant and Designation of Matter for filing in the above referenced appeal. Also, please find enclosed a check for \$25.00 for the filing fee.

With kind regards, I remain

Sincerely,



Daniel J. Farnsworth, Jr.  
Attorney for Appellant  
Bar Number 06922

Enclosures

cc: Mr. Daniel Hughes, Esquire

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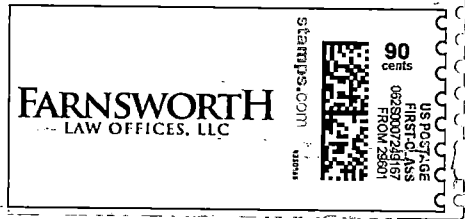
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**FARNSWORTH LAW OFFICES, LLC**

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