

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APR 21 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.

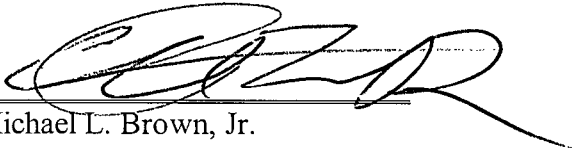
James Delaney Allen, III,

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,

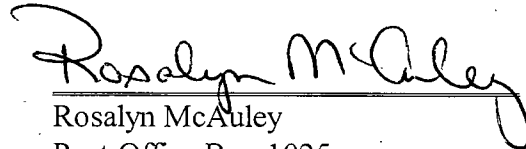
Respondent.

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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. Main St., 3<sup>rd</sup> Floor, Rock Hill, SC 29730.

April 14, 2015



Rosalyn McAuley  
Post Office Box 1025  
Rock Hill, SC 29731  
(803) 328-8822  
Paralegal to Michael L. Brown

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**SC Court of Appeals**

*The Law Offices of*  
**MICHAEL L. BROWN, JR.**

223 Main Street, Suite 550, Rock Hill, SC • PO Box 1025, Rock Hill, SC 29731

Telephone: (803)328-8822

Facsimile: (803)328-0523

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April 20, 2015

SC Court of Appeals  
Attn Ms. Fuller  
1015 Sumter Street  
Columbia, SC 29211  
**HAND DELIVERED**

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APR 21 2015

**SC Court of Appeals**

Dear Ms. Fuller:

Please find enclosed our envelope that was returned due to an error in the mailing address.

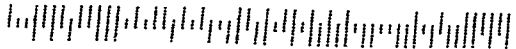
Please note that we had corrected the label when it was returned to us, but decided to resend the motion in a different envelope to avoid the same problem. The part of the address written in pen was done after it was returned to us.

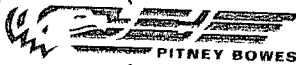
The motion was resubmitted today, April 20, 2015.

Thank you,



Michael L Brown, Jr



UNITED STATES POSTAGE  
  
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*The Law Offices of Michael L. Brown, Jr.*  
 223 Main Street  
 One Law Place, Suite 550  
 Post Office Box 1025  
 Rock Hill, SC 29731

RETURN  
 TO SENDER



- UNDELIVERABLE AS ADDRESSED
- ATTEMPTED NOT KNOWN
- INSUFFICIENT ADDRESS
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- NO SUCH STREET
- IN DISPUTE
- BOX CLOSED
- MLNA - UNABLE TO FORWARD
- REFUSED
- VACANT
- ILLEGIBLE
- UNCLAIMED

The Honorable Jenny Abbott  
 Kitchings  
 Clerk, South Carolina Court of  
 Appeals  
 P. O. Box 11629

*Columby & 29201*

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