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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APR 10 2015

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Hon. DeAndrea Gist Benjamin, Circuit Court Judge

Circuit Court Case No. 2010-CP-40-1343
S.C. Court of Appeals Case No. 2014-002032

James W. Trexler,

Appellant,

v

Richland County and the
Sheriff of Richland County in
his Official Capacity, a/k/a
Richland County Sheriff's
Department

Respondents.

MOTION FOR EXTENSION TO FILE REPLY
TO RESPONDENTS' INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL

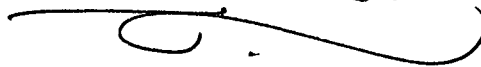
Appellant respectfully moves this Court for a seven (7) day extension of time until April 16, 2015 to file and serve Appellant's Reply to Respondents' Initial Brief and Designation of Matter to be included in the Record on Appeal.

Appellant's motion is based on the following grounds:

1. Appellant's Reply to Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal is currently due to be filed and served on April 9, 2015.
2. The undersigned counsel for Appellant requires additional time to complete the Reply due to an out-of-town trip from which he has just returned, and other counsel for Appellant, Mr. Hamrick, having been out sick with the flu.
3. Counsel for Appellant has consulted with counsel for Respondents who has consented to the requested extension. (See attached e-mail).

WHEREFORE, Appellant respectfully requests he be allowed until and through April 9, 2015 to file and serve his Reply to Respondents' Initial Brief ad Designation of Matter to be Included in the Record on Appeal

Respectfully submitted,



William H. Johnson
Law Offices of William H. Johnson, LLC
411 North Brooks Street
Post Office Box 137
Manning, South Carolina 29102
(803) 435-0909 (telephone)
(803) 435-2858 (facsimile)

-and-

W. Westbrook Wills III
Attorney at Law
PO Box 822
Folly Beach, SC 29439
(843) 805-6300 (telephone)
(866) 922- 8596 (facsimile)

-and-

Matthew D Hamrick
Attorney at Law
Tidewater Executive Center
222 W. Coleman Blvd.

Mt. Pleasant, SC 29464
(843) 693-4700 (telephone)
(877) 524-5023 (facsimile)
ATTORNEYS FOR APPELLANT

CHARLESTON, SC
April 7, 2015



From **Andrew Lindemann** alindemann@dmi-law.com
 Subject Re: Trexler appeal - IMPORTANT
 Date April 7, 2015 at 2 22 PM
 To W Westbrook Wills III wwills@wwillslaw.com
 Cc matt@matthamricklaw.com, **William H Johnson** William@whjohnsonlaw.com

No problem We consent

Andrew

Sent from my iPhone

On Apr 7, 2015, at 2 12 PM, W Westbrook Wills III <wwills@wwillslaw.com> wrote

Andrew

Hope you and your family had a nice Easter

I have just returned to the office from a vacation (long over due) and Matt has been out of the office sick for a few days. Would you consent to our now requesting a 7 day extension to file our Reply to y'all's Initial Brief which according to my calculations is due to be filed and served by Thursday

Thanks

Brook

W Westbrook Wills III
 The Law Office of W Westbrook Wills III
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 Tel (843) 805-6300
 Fax (866) 922-8596

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On Mar 12, 2015, at 11:54 AM, Andrew Lindemann <alindemann@dmi-law.com> wrote

Thanks I appreciate it.

From: W. Westbrook Wills III [<mailto:wwills@wwillslaw.com>]
Sent: Thursday, March 12, 2015 11:54 AM
To: Andrew Lindemann
Cc: matt@matthamricklaw.com; William H Johnson
Subject: Re: Trexler appeal - IMPORTANT

Andrew,

We have no problem consenting to the extension you propose below.

Brook

W. Westbrook Wills III
 The Law Office of W Westbrook Wills III
 P O Box 822

Folly Beach, SC 29439
Tel. (843) 805-6300
Fax (866) 922-8596

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On Mar 12, 2015, at 11:46 AM, Andrew Lindemann <alindemann@dml-law.com> wrote:

Matt, Brook and William.

I need a favor. Our Initial brief is due Friday I need to ask the Court of Appeals for an additional week – through March 20th. I have another Supreme Court brief due this coming Monday , plus I had two other briefs as well as a Federal SJ that were due earlier this week. My son also has a baseball game tonight that I'd really like not to miss.

I need to file that motion this afternoon. Can I inform the Court that the Appellant consents. I would appreciate the courtesy.

Thanks.

Andrew

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Hon. DeAndrea Gist Benjamin, Circuit Court Judge

Circuit Court Case No. 2010-CP-40-1343
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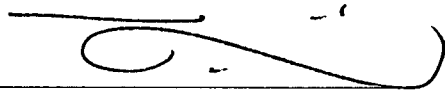
Respondents.

CERTIFICATE OF SERVICE

The undersigned counsel for Appellant hereby certifies that service of Appellant's **Motion for Extension to File Reply to Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal** in the above-captioned matter was made upon all counsel of record, this 7th day of April, 2015, by placing copies in the U.S. Mail, first class prepaid postage, addressed as follows:

Andrew F. Lindemann
Robert D. Garfield
DAVIDSON & LINDEMANN, P.A.
1611 Devonshire Drive
Post Office Box 8568
Columbia, South Carolina 29202

RECEIVED
APR 10 2015
SC Court of Appeals



W. Westbrook Wills III

CHARLESTON, SC
April 7, 2015

THE LAW OFFICE OF
W. WESTBROOK WILLS III

W. WESTBROOK WILLS III
Admitted in Georgia & South Carolina

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FOLLY BEACH, SC 29439

TELEPHONE (843) 805-6300
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wwills@wwillslaw.com

April 7, 2015

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SC Court of Appeals

VIA US MAIL

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

Re: *James W. Trexler v. Richland County (2014-002032): Appellant's Motion for Extension to Reply to Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal.*

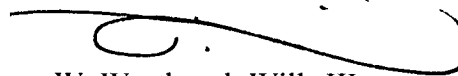
Dear Ms. Kitchings:

Please find enclosed for filing the original and two copies of Appellant's Motion for Extension to Reply to Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above-referenced case. Also enclosed is a check for \$25.00 for the filing fee.

By copy of this letter and enclosures, I am serving copied on all counsel of record.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact me

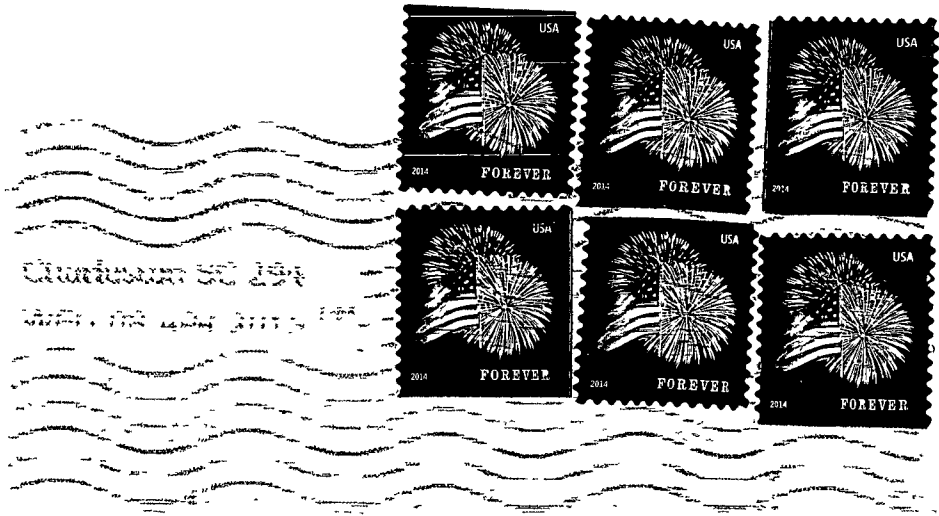
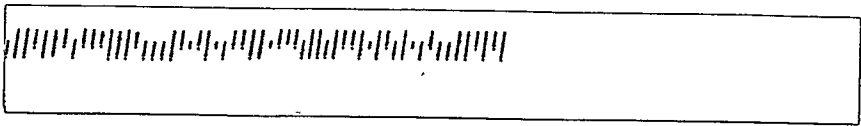
Very truly yours,



W. Westbrook Wills III

Enclosures (as stated)

cc: Andrew F. Lindemann, Esq. (w/ enclosures)
Robert D. Garfield, Esq. (w/ enclosures)
Matthew D. Hamrick, Esq. (via e-mail)
William H Johnson, Esq. (via e-mail)



LAW OFFICE OF
W. Westbrook Wills III
 CIVIL TRIAL LAWYER
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Jenny Abbott Kitchings
 Clerk of Court
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