

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

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Case Number 2011-CP-38-01379

APPELLATE CASE NO.: 2014-000168

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William Breland, .....Respondent

v.

South Carolina Department of Transportation, .....Appellant,

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MOTION FOR EXTENSION

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Pursuant to Rule 240, SCACR, the appellant requests a 30-day extension of the deadline for filing and serving its initial reply brief in this case. The current deadline is Friday, May 1, 2015. The grounds for this motion is counsel's busy schedule, and Attorney Hood, who is working this matter, is on maternity leave until approximately May 18, 2015. This is the first extension request for this deadline.

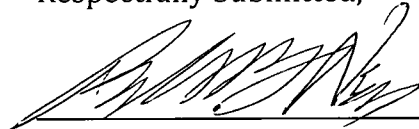
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APR 30 2015

**SC Court of Appeals**

Respectfully Submitted,



Richard B. Ness  
Norma A. T. Jett  
Alison Dennis Hood  
Adam C. Ness  
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Phone: (803) 245-5178  
Fax. (803) 245-5384  
Attorneys for Appellant

April 28, 2015

IN THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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APPEAL FROM ORANGEBURG COUNTY

Honorable Edgar Warren Dickson, Chief Administrative Judge, Presiding

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CASE NO.: 2011-CP-38-1379

APPELLATE CASE NO.: 2014-000168

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William Breland,

Respondent,

-vs-

South Carolina Department of Transportation,

Appellant.

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APR 30 2015

**SC Court of Appeals**

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**PROOF OF SERVICE**

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I certify that I have served the Motion for Extension on counsel for Respondent, William Breland, and all other counsel of record, by depositing a copy of it in the United States Mail, postage prepaid, on April 28, 2015, addressed to the persons below-listed:

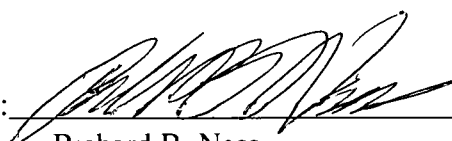
John S. Nichols, Esq.  
P. O. Box 7965  
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J. Christopher Wilson, Esq.  
Daniel W. Luginbill, Esq.  
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Respectfully Submitted,

NESS & JETT, LLC

BY:



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\_\_\_\_\_  
\*CERTIFIED CIRCUIT COURT MEDIATOR

ALISON DENNIS HOOD  
ADAM C NESS

\_\_\_\_\_  
JULIUS B NESS  
1916-1991

April 28, 2015

Jenny Abbott Kitchings, Clerk of Court  
S. C Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

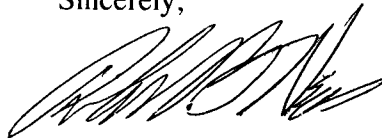
Re: William Breland v. South Carolina Department of Transportation  
Appellate Case No.: 2014-000168

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 Respondent and a \$25.00 check for filing this motion. Please return the additional filed copy to me in the self-addressed, stamped envelope I have enclosed.

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

Sincerely,



Richard B. Ness

RBN/dlh

Enclosures

CC: J. Christopher Wilson, Esq. (Via Hand Delivery)  
Daniel W. Luginbill, Esq. (Via Hand Delivery)  
John S. Nichols, Esq.

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**SC Court of Appeals**



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