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THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
Honorable Marvin H. Dukes, III

RECEIVED
JUN 10 2015
SC Court of Appeals

Appellate Case No.: 2014-000636
Beaufort County Case No.: 2013-CP-07-00918

MARE BARACCO.....Appellant,

vs.

BEAUFORT COUNTY, SOUTH CAROLINA.....Respondent.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER

The Respondent, Beaufort County, South Carolina, respectfully requests an extension of time to file Respondent's Initial Brief and Designation of Matter. If the motion is granted, the Initial Brief would be due at least thirty (30) days from the date of the Order Granting the Motion for Extension of Time. The undersigned needs additional time to requests copies of transcripts which the Appellant made part of the record without notifying the Respondent pursuant to Rule 207(a). Until we receive a copy of these transcripts, the Respondent cannot determine what information and argument the brief should contain. Therefore, additional time is needed to complete the Initial Brief.

HOWELL, GIBSON & HUGHES, P.A.

By: 

Mary Bass Lehr

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(843) 522-2400

Attorney for Respondent

Beaufort, South Carolina

June 8, 2015

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that he has served the foregoing Motion for Extension of Time to File Initial Brief and Designation of Matter upon all counsel of record by affixing same with proper postage and placing same with the United States Postal Service on 9 day of June, 2015 addressed to the following:

Mare Baracco
1006 Madrid Ave.
Port Royal, SC 29935

AND

Joshua A. Gruber, Esquire
Allison Collins Coppage, Esquire
Beaufort County Staff Attorney
Post Office Box 1228
Beaufort, SC 29901

HOWELL, GIBSON & HUGHES, P.A.

By: 

Mary Bass Lohr

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Attorney for Respondent

Beaufort, South Carolina

June 8, 2015

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June 8, 2015

Ms. V. Claire Allen
Deputy Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: Mare Baracco vs. Beaufort County, South Carolina
Civil Action No.: 2014-000636
Our File No: 11369 MBL

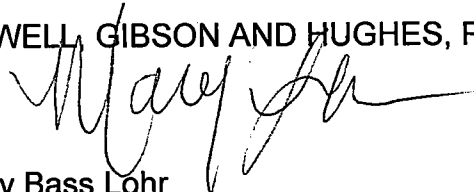
Dear Ms. Allen:

Please find enclosed herewith for filing an original and six (6) copies of the Motion for Extension of Time to File Initial Brief and Designation of Matter with regard to the above referenced matter. I would appreciate your filing the same and returning a filed clocked copy to me in the enclosed self-addressed, stamped envelope provided for your convenience.

With kindest regards, I am

Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.


Mary Bass Lohr
MBL/ad

Enclosure

cc: Ms. Mare Baracco
Joshua A. Gruber
Allison Collins Coppage

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