

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
JUN 19 2015  
SC Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

John C. Hayes, III, Circuit Court Judge

Case No. 2011-CP-46-03645

City of Rock Hill.....Respondent

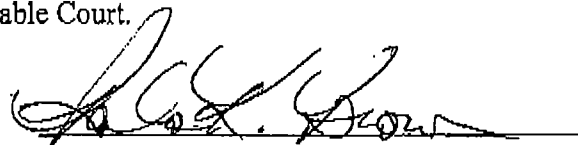
v.

Neal A. Nessmiller.....Appellant.

MOTION FOR EXTENSION OF TIME/  
MOTION TO FILE RESPONDENT'S INITIAL BRIEF  
AND DESIGNATION OF MATTER  
WITHIN EXTENDED TIME

Respondent moves for an extension of time to file Respondent's Initial Brief and Designation of Matter.

The undersigned attorney represents the City of Rock Hill in this matter. Counsel completed the last day of the current jury trial term in Rock Hill on June 19, 2015. Counsel submitted a docket of jury trial cases to the court for the July 6-10, 2015 jury trial term, as required by the Court on June 18<sup>th</sup>. Counsel's assigned case load for the July jury trial term includes 103 cases between first -third appearance matters. Counsel has two weeks to get the cases prepared, witnesses contacted and interviewed, offers out and negotiations with opposing counsel to complete prior to presenting these cases for pleas, trials, and/or other dispositions. Counsel respectfully requests a thirty (30) day extension of time from this Honorable Court.



Paula Knox Brown  
Attorney for Respondent  
210 E. Main Street, Suite 300  
Rock Hill, South Carolina 29730  
803-329-5641

July 19, 2015  
Rock Hill, South Carolina

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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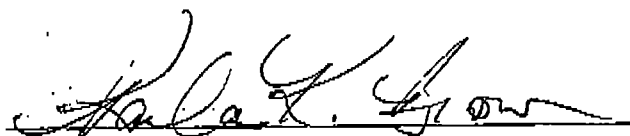
v.

Neal A. Nessmiller,.....Appellant.

CERTIFICATE OF SERVICE

I, Paula Knox Brown, hereby certify that I served the Appellant's *Motion for Extension of Time/Motion To File Respondent's Initial Brief and Designation of Matter within Extended Time* on counsel for Respondent, Michael L. Brown, Jr., Esquire, by depositing a copy of the document in the United States mail, with sufficient postage affixed, on the 19<sup>th</sup> day of June, 2015. The envelope was addressed as follows:

Michael L. Brown, Jr.  
Post Office Box 1025  
Rock Hill, SC 29731



Paula Knox Brown  
Attorney(s) for Appellant  
201 E. Main Street, Suite 300  
Rock Hill, South Carolina 29730  
803-329-5641

June 19, 2015  
Rock Hill, South Carolina



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JUN 19 2015

SC Court of Appeals

June 19, 2015

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

RE: The City of Rock Hill v. Neal Nessmiller  
 Case No. 2015-000130

Dear Ms. Allen:

Enclosed for filing with your office is the Appellant's *Motion for Extension of Time/Motion To File Appellant's Designation of Matter within Extended Time* in this case. The *Certificate of Service* on Michael Brown, Esquire is also being forwarded to you with two (2) additional copies of each document. Please return two (2) clocked copies per document to me in the enclosed self-addressed, stamped envelope.

Respectfully yours,

Paula Knox Brown  
 Attorney for Appellant

cc: Michael L. Brown, Esquire (mailed and faxed) ←

**DELIVERED VIA FACSIMILE TRANSMITTAL TO 803-734-1839 AND VIA REGULAR UNITED STATES MAIL**



**CITY OF ROCK HILL SOLICITOR'S OFFICE**  
 201 E. MAIN STREET, 3RD FLOOR, ROCK HILL, SOUTH CAROLINA 29730  
 OFFICE 803/329-5619 FACSIMILE 803/326-3865



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JUN 19 2015

SC Court of Appeals

**FAX COVER SHEET**

TO: Michael Brown, Esquire  
@ 328-0523

FROM: Paula Knox Brown  
City Solicitor

DATE: June 19, 2015

RE: City of Rock Hill v. Neal Nessmiller

Please see the attached letter and Motion with Certificate of Service.

(Have a good weekend!)



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**CITY OF ROCK HILL SOLICITOR'S OFFICE**

201 E. MAIN STREET, 3RD FLOOR, ROCK HILL, SOUTH CAROLINA 29730  
OFFICE 803/329-5619 FACSIMILE 803/326-3865