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STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
JUN 19 2015
SC Court of Appeals
7/29

Appeal from Greenville County
Honorable Alison Renee Lee, Circuit Court Judge
Appellate Case No. 2014-002105

MICHAEL EDWARD SCHULZ,

APPELLANT,

vs.

CITY OF GREER,

RESPONDENT.

**MOTION FOR EXTENSION OF TIME WITHIN WHICH
TO SERVE AND FILE THE INITIAL BRIEF OF RESPONDENT
AND DESIGNATION OF MATTER**

Respondent ("City of Greer"), through its undersigned counsel, would respectfully show unto this Court as follows:

The Initial Brief of Respondent and Designation of Matter are due to be served and filed no later than June 28, 2015. However, due to counsel's workload and planned vacation, I am requesting an extension of time in which to serve and file the Initial Brief of Respondent and Designation of Matter.

This extension request is not intended for purposes of delay.

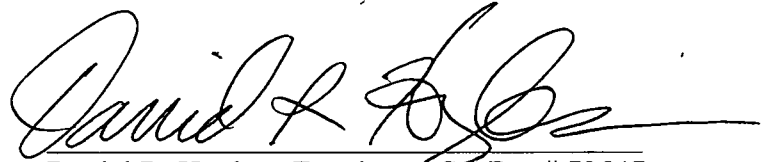
WHEREFORE, Respondent prays that this Court grant its Motion for Extension of Time within which to serve and file the Initial Brief of Respondent and Designation of Matter in this

case for an additional thirty (30) days from the date such relief is granted; and for such other relief as this Court may deem just and proper.

Respectfully submitted,

DUGGAN & HUGHES, LLC

6/15, 2015



Daniel R. Hughes, Esquire SC Bar # 72547
Attorney for Respondent City of Greer
457-B Pennsylvania Ave.
Greer, South Carolina 29650
(864) 334-2501

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IN THE COURT OF APPEALS

Appeal from Greenville County
Honorable Alison Renee Lee, Circuit Court Judge
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MICHAEL EDWARD SCHULZ,

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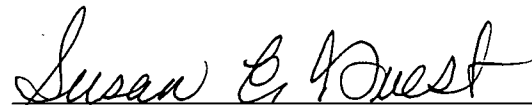
CITY OF GREER,

RESPONDENT.

PROOF OF SERVICE

I certify that I served the Motion for Extension of Time within Which to Serve and File the Initial Brief of Respondent and Designation of Matter upon opposing counsel, Daniel J. Farnsworth, Jr., by depositing a copy of same in the United States mail, postage prepaid, addressed as follows:

Daniel J. Farnsworth, Jr., Esquire
Farnsworth Law Offices, LLC
Post Office Box 8719
Greenville, SC 29604



Susan E. Guest, Paralegal
DUGGAN & HUGHES, LLC
Post Office Box 449
Greer, SC 29652-0449
Direct: 864-334-2505
Fax: 864-879-0149

June 16, 2015

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DUGGAN & HUGHES, LLC
ATTORNEYS AND COUNSELORS AT LAW

John B. Duggan
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Evan C. Bramhall

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Greer, South Carolina 29650
Telephone: (864) 879-0144 or (864) 334-2500
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Post Office Box 449
Greer, S.C. 29652

RECEIVED

June 15, 2015

JUN 19 2015

SC Court of Appeals

The South Carolina Court of Appeals
Attn: Clerk of Court
Post Office Box 11629
Columbia, SC 29211

Re: City of Greer vs. Michael Edward Schulz [Appeal]
Appellate Case No.: 2014-002105

Dear Clerk:

Enclosed please find the original and one copy of the Motion for Extension of Time within Which to Serve and File the Initial Brief of Respondent and Designation of Matter, along with a Certificate of Service for same in regard to the above-referenced matter. I am also enclosing this firm's check made payable to you in the amount of \$25.00 to cover your cost for filing. Please return our clocked copy in the self-addressed prepaid envelope provided.

Furthermore, by copy of this letter I am serving same upon opposing counsel.

Sincerely,

DUGGAN & HUGHES, LLC



Susan E. Guest
Paralegal

squest@dugganhughes.com
Direct: 864-334-2505

DRH/seg
Enclosures

Cc w/encl:
Daniel J. Farnsworth, Jr., Esquire
Farnsworth Law Offices
P.O. Box 8719
Greenville, SC 29604