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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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JUN 25 2015

Appeal from Dorchester County
Court of Common Pleas

SC Court of Appeals

Diane Schafer Goodstein, Circuit Court Judge

Appellate Case No. 2015-000058
Trial Court Case No. 2013-CP-18-00735

William McFarland and Jennifer McFarland,

Appellants/Respondents,

v.

Mansour Rashtchian and Amy Rashtchian,

Respondents/Appellants.

CONSENT MOTION
FOR THIRD EXTENSION OF TIME
TO FILE/SERVE ALL PARTIES' INITIAL APPELLANTS' BRIEFS

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
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(843) 720-5488
Attorneys for Appellants/Respondents

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA
COURT OF APPEALS

COME NOW Appellants/Respondents William McFarland and Jennifer McFarland (“Primary Appellants”), by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, **with the consent of Respondents/Appellants Mansour Rashtchian and Amy Rashtchian** (“Secondary Appellants”), and move this Honorable Court for an additional extension of seven (7) days’ time to file/serve Primary Appellant’s initial appellants’ brief and corresponding designation of matter to be included in the record on appeal **as well as for the Secondary Appellants to be granted the same 7-day extension of time.**

The present deadline for all parties to file/serve their initial appellants’ briefs and designations of matter is **June 25, 2015**. In establishing the present deadline, the Court advised, “[n]o further extensions will be granted absent extraordinary circumstances.” Primary Appellants’ counsel does not make this motion lightly; rather, counsel does so most humbly, submitting that, under the circumstances, the relief requested herein is reasonable and consistent with the interests of justice and will work no undue prejudice upon Secondary Appellants. **Indeed, as reflected above, prior to making this motion, Primary Appellants’ counsel consulted with Secondary Appellants’ counsel, Michael L. Leech, Esquire, who kindly authorized**

Primary Appellants to represent to the Court that Secondary Appellants have no objection to this motion, which motion includes the request that Secondary Appellants' briefing/designation deadline be extended 7 days, i.e., the same as Primary Appellants'.

In further support of this motion, Primary Appellants' counsel notes that this an appeal from jury-trial proceedings that spanned five (5) days, that Primary Appellants' counsel was not trial counsel, and that the transcript is in excess of 800 pages. Additionally, the demands upon Primary Appellants' counsel's time of late, both professional and personal, can fairly be described as extraordinary, including out-of-state, work-related travel, the preparation of numerous briefs in other pending federal litigation, and time related to the recent sale of the undersigned's house (and moving associated therewith).

WHEREFORE, Primary Appellants, **with the consent of Secondary Appellants**, respectfully request this Honorable Court grant an additional 7-day extension of time (from June 25, 2015) for **all parties** to file/serve their initial appellants' briefs and corresponding designations of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving **all parties'** initial appellants' briefs and designations would be **July 2, 2015**, according to the undersigned's

calculations. Further, Primary Appellants respectfully request that the Court hold all parties' present deadline for initial appellants' briefs/designations of matter in abeyance until it acts upon this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)

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Attorneys for Appellants/Respondents

Charleston, South Carolina

Dated: 6/23/15

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The Honorable Diane Schafer Goodstein, Circuit Court Judge

Case No. 2013-CP-18-0735

William McFarland and Jennifer McFarland,

Appellants/Respondents,

v.

Mansour Rashtchian and Amy Rashtchian,

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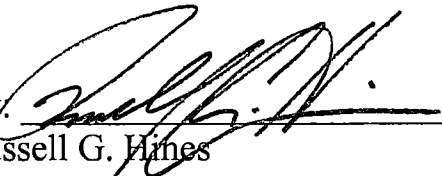
PROOF OF SERVICE

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*Attorneys for the
Appellants/Respondents*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Appellants/Respondents above named, do hereby certify that I have served the **Consent Motion For Third Extension of Time to File/Serve All Parties' Initial Appellants' Brief** on the above-named Respondents/Appellants by depositing a copy of the same in the United States Mail, postage prepaid, on June 23, 2015, addressed as follows to their counsel of record:

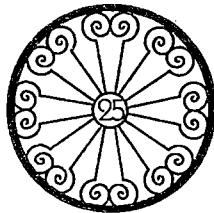
David C. Cleveland, Esquire
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YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines

Charleston, South Carolina

Dated: 6/23/15



YCR LAW

Young Clement Rivers, LLP

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SC Court of Appeals

June 23, 2015

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

Re: William McFarland and Jennifer McFarland v. Mansour Rashtchian and Amy Rashtchian
Appellate Case No.: 2015-000058
Circuit Court Case No.: 2013-CP-18-0735
YCR File: 15508-20150131


Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of a Third Motion for Extension of Time to File/Serve Appellants' Initial Brief and the original and two (2) copies of a Proof of Service regarding the same. Also enclosed is a firm check in the amount of \$25.00 to cover the costs associated with this request.

Kindly file the originals and return one court-stamped copy to me using the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP


Aimee M. Justman
Legal Assistant

/amj

Enclosures

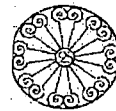
cc: Michael L. Leech, Esquire, Clawson & Staubes, LLC
David C. Cleveland, Esquire, Clawson & Staubes, LLC

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20150131

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South Carolina Court of Appeals
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