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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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JUL 07 2015

SC Court of Appeals

Appeal from Dorchester County
Court of Common Pleas

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.

**MOTION
FOR 2-DAY, FINAL EXTENSION OF TIME
TO FILE/SERVE INITIAL APPELLANTS' BRIEF
OF APPELLANTS/RESPONDENTS**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(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, and move this Honorable Court for a final additional extension of two (2) days’ time to file/serve Primary Appellants’ initial appellants’ brief and corresponding designation of matter to be included in the record on appeal.

In the most recent motion for extension, filed June 23, 2015, asking the Court to allow all parties until July 2, 2015, to file/serve their initial appellants’ briefs, Primary Appellants sought the July 2nd deadline, rather than one farther out, in the spirit of requesting modest relief while still believing in good faith that the requested relief would be sufficient. It has, however, become apparent to the undersigned that the previously requested July 2nd deadline was too ambitious. Consequently, and to be sure, as in the case of the last motion, not lightly, but most humbly, Primary Appellants’ counsel makes this motion 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 Respondents/Appellants Mansour and Amy Rashtchian.

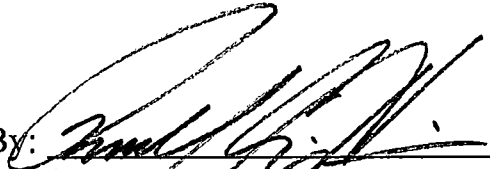
In further support of this motion, Primary Appellants’ counsel notes

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, respectfully request this Honorable Court grant them a 2-day, final extension of time (from July 2, 2015) to file/serve their initial appellants' brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the deadline for filing/serving initial appellants' briefs and designations would be July 7, 2015, according to the undersigned's calculations (since July 3rd is a state holiday and the 4th and 5th Saturday and Sunday, respectively). Further, Primary Appellants respectfully request that the Court hold present deadline for their initial appellants' brief/designation 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: 7/2/15

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Dorchester County
Court of Common Pleas

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,

Respondents/Appellants.

PROOF OF SERVICE

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*Attorneys for the
Appellants/Respondents*

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I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Appellants/Respondents above named, do hereby certify that I have served the **MOTION FOR 2-DAY, FINAL EXTENSION OF TIME TO FILE/SERVE INITIAL APPELLANTS' BRIEF OF APPELLANTS/RESPONDENTS** on the above-named Respondents/Appellants by depositing a copy of the same in the United States Mail, postage prepaid, on July 2, 2015, addressed as follows to their counsel of record:

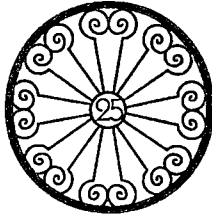
David C. Cleveland, Esquire
Michael L. Leech, Esquire
Clawson & Staubes, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492-7595

YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines

Charleston, South Carolina

Dated: 7/2/15



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SC Court of Appeals

July 2, 2015

VIA FACSIMILE AND US MAIL

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 Motion for 2-Day, Final Extension of Time to File/Serve Initial Appellants' Brief of Appellants/Respondents 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: (All below via Email and US Mail)
Michael L. Leech, Esquire, Clawson & Staubes, LLC
David C. Cleveland, Esquire, Clawson & Staubes, LLC

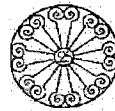
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RGH
15508-
20150131

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South Carolina Court of Appeals
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SC Court of Appeals

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