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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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JUL 14 2015

APPEAL FROM LEXINGTON COUNTY
CIRCUIT COURT FOR THE ELEVENTH JUDICIAL CIRCUIT

SC Court of Appeals

DOCKET NO. 2014-CP-32-01537

Julius Brazell, Appellant,

v.

Town of Chapin, South Carolina; and
County of Lexington South Carolina, Respondent.

**MOTION FOR EXTENSION TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD
ON APPEAL**

Appellant, Julius Brazell, by and through his undersigned counsel, hereby moves for a Thirty (30) day extension of time to file his Initial Brief and Designation of Matter. This Motion is made on the grounds that Attorney Margaret Hazel, who was to prepare the Initial Brief and Designation of Matter for Appellant has left the employ of Moore Taylor Law Firm, P.A. The undersigned, Attorney John C. Bradley, Jr. took over this case and other appeals that Attorney Hazel was working on.

As a result of Attorney Hazel leaving, the undersigned has had, or has the following deadlines due in the South Carolina Court of Appeals: a Record on Appeal due July 8th; an Initial Brief and Designation of Matter due July 8th; a Record on Appeal due July 12th; two Reply Briefs due on July 20th; a Reply brief due July 23rd;

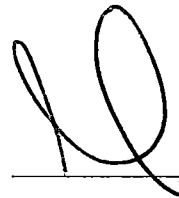
and three final briefs due July 28th and 29th and 30th. As a result of this increased work load, the undersigned needs additional time to complete the Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case.

The undersigned is aware that this is the second request for an extension. However, this request is not intended for purposes of delay. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculations, the extension, if granted, would extend Appellant's deadline for filing the Initial Brief and Designation of Matter to August 16, 2015.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing its Initial Brief and Designation of Matter to August 16, 2015.

Respectfully submitted,

By: _____



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John C. Bradley, Jr.
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West Columbia, South Carolina
July 14, 2015

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v.

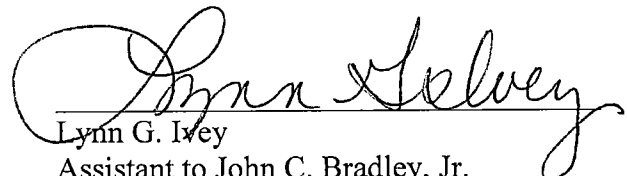
Town of Chapin, South Carolina; and
County of Lexington South Carolina, Respondent.

PROOF OF SERVICE

I certify that I served the Motion for Extension, by mail, postage prepaid, to
Respondents' counsel on July 14, 2015 to:

Daniel R. Settana, Jr., Esq.
Richard Eugene Marsh, III, Esq.
P.O. Box 7217
Columbia, SC 29202

Jeffrey M. Anderson, Esq.
P.O. Box 489
Lexington, SC 29071



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July 14, 2015

The Honorable Jenny Abbott Kitchings
Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, South Carolina 2921

RE: Julius Brazell, Appellant, vs. Town of Chapin, South Carolina; and
County of Lexington South Carolina, Respondent
Appellate Case No. 2015-000329

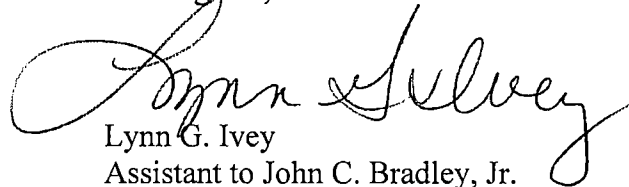
Dear Ms. Kitchings:

Enclosed for filing please an original and seven copies of Appellant's Motion for Extension of Time to File and serve its Initial Brief and Designation of Matter to be Included in Record on Appeal. I have also enclosed our firm's check in the amount of \$25.00 for the filing fee. I would appreciate your returning us the clocked-in copies via our courier.

By copy of this letter to all parties involved in this matter, I am serving them a copy of our enclosed Motion.

Thank you in advance for your assistance in this matter. If you have any questions or need any additional information and/or documentation from our office, please give us a call.

Best regards,


Lynn G. Ivey
Assistant to John C. Bradley, Jr.

Enclosures

cc: Daniel R. Settana Jr., Esq.
Richard Eugene Marsh, III, Esq.
Jeffrey M. Anderson, Esq.

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JUL 14 2015

SC Court of Appeals

S. Jahue Moore†
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Melissa K. Moore
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Margaret "Meg" Hazel
Billy C. Coleman (Ret.)