

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

SEP - 4 2015

George C. James, Jr., Circuit Court Judge

S.C. Supreme Court

Appellate Case No. 2015-001663
Case No. 2011-CP-36-00588

Danny Abrams and Frances Abrams Appellants,

v.

City of Newberry Respondent.

**RESPONDENT CITY OF NEWBERRY'S MOTION FOR EXTENSION OF TIME TO
RESPOND TO PETITION FOR WRIT OF CERTIORARI**

**TO: THE HONORABLE JUSTICES OF THE SOUTH CAROLINA SUPREME
COURT:**

Respondent respectfully moves this Court for an Order granting it an extension of twenty days until September 24, 2015 in which to file Respondent's Response to Petitioner's Petition for Writ of Certiorari in this action.

Counsel for Respondent represents to this Court that despite diligent efforts to prepare the Response to the Petitioner's Petition for Writ of Certiorari, deadlines in other matters prevented counsel from being able to meet the deadline. This is the first request for an extension.

Respondent represents to this Court that counsel for Respondent consulted with counsel for the Petitioner, and he has consented to this request.

(Signature to follow on page 2)

MORRISON LAW FIRM, LLC

By: Kassi B. Sandifer

David L. Morrison

Kassi B. Sandifer

7453 Irmo Drive, Suite B

Columbia, South Carolina 29212

Phone: (803) 661-6285

Fax: (803) 661-6289

E-mail: david@dmorrison-law.com

E-mail: kassi@dmorrison-law.com

ATTORNEYS FOR THE RESPONDENT

Columbia, South Carolina

September 2, 2015

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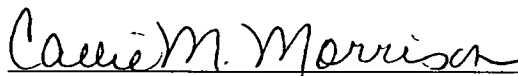
v.

City of Newberry Respondent.

CERTIFICATE OF SERVICE

The undersigned employee of Morrison Law Firm, LLC, attorney for the Respondent, City of Newberry, does hereby certify that service of the Respondent's Motion for Extension of Time to Respond to Petition for Writ of Certiorari in the above-captioned action was made upon all counsel of record by placing same in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 2nd day of September, 2015, addressed as follows:

Christian Stegmaier, Esquire
Post Office Box 12487
Columbia, South Carolina 29211


Callie M. Morrison

Columbia, South Carolina