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

Appeal from Dorchester County
Court of Common Pleas

Diane Schafer Goodstein, Circuit Court Judge

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SEP 10 2015

SC Court of Appeals

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.

**SECOND MOTION FOR EXTENSION OF TIME REGARDING
INITIAL RESPONDENTS' BRIEF
OF APPELLANTS/RESPONDENTS
AND DESIGNATION OF MATTER**

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 an extension of thirty (30) days’ time to serve and file Primary Appellants’ initial respondents’ brief, i.e., their brief responding to the initial appellants’ brief of Respondents/Appellants Mansour Rashtchian and Amy Rashtchian (“Secondary Appellants”), and Primary Appellants’ corresponding designation of matter to be included in the record on appeal.


Secondary Appellants’ served their initial appellants’ brief on June 24, 2015, and by way of previous Order dated July 29, 2015, this Court has extended the deadline for Primary Appellants’ initial respondents’ brief with the current due date being today, September 8, 2015.

In light of other time commitments, the undersigned respectfully requests that Primary Appellants’ deadline for serving/filing their initial respondents’ brief and corresponding designation of matter to be included in the record on appeal be extended by 30 days from September 8, 2015, i.e., through October 8, 2015. Primary Appellants’ counsel submits that the relief requested herein is reasonable and consistent with the interests of justice and will work no undue prejudice upon Secondary Appellants.

WHEREFORE, Primary Appellants respectfully request this Honorable Court to grant them a thirty (30)-day extension of time, running from, today, September 8, 2015, for Primary Appellants to serve and file their initial respondents' brief and corresponding designation of matter. According to Primary Appellants' calculations, were this relief to be granted, the new deadline for their initial respondents' brief/designation of matter would be October 8, 2015, i.e., thirty (30) days after September 8, 2015. Lastly, Primary Appellants respectfully request that the Court hold the present deadline for their initial respondents' 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: 9/8/15

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Trial Court Case No. 2013-CP-18-00735

William McFarland and Jennifer McFarland,

Appellants/Respondents,

v.

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Respondents/Appellants.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP

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Attorneys for Appellants/Respondents

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SC Court of Appeals

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants/Respondents above named, do hereby certify that I have served the **MOTION FOR EXTENSION OF TIME REGARDING INITIAL RESPONDENTS' BRIEF OF APPELLANTS/RESPONDENTS AND DESIGNATION OF MATTER** on the above-named Respondents/Appellants by depositing a copy of the same in the United States Mail, postage prepaid, on September 8, 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

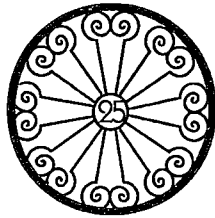
YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines

Charleston, South Carolina

Dated: 9/8/15



YCR LAW

Young Clement Rivers, LLP

CELEBRATING 50 YEARS OF LEGAL SERVICE

50 YEARS

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: kbarnes@ycrlaw.com

September 8, 2015

VIA FACSIMILE & US MAIL

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

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SC Court of Appeals

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 please find the original and seven (7) copies of Second Motion for Extension of Time Regarding Initial Respondents' Brief of Appellants/Respondents and Designation of Matter, the original and one (1) copy of the Proof of Service and our firm's check in the amount of \$25.00.

Please file the original and return a court-stamped copy to me in the envelope provided.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes
Secretary

/kbb

Enclosure(s)

(via US Mail and email)

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

Hasler FIRST-CLASS MAIL

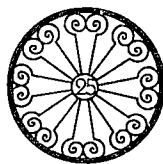
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