

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

William P. Keesley, Circuit Court Judge

Appellate Case No. 2015-000329

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SC Court of Appeals
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Julius Brazell,..... Appellant,

v.

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

**MOTION FOR EXTENSION TO FILE
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 Record on Appeal. This Motion is made on the grounds that, due to extraordinary weather related circumstances and resulting disruptions in normal business functions, additional time is necessary in order to prepare the Record on Appeal.

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 Record on Appeal to November 16, 2015.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing the Record on Appeal to November 16, 2015.

Respectfully submitted,

By: 

S. Jahue Moore
John C. Bradley, Jr.
MOORE TAYLOR LAW FIRM, PA
1700 Sunset Boulevard
West Columbia, SC 29169
803-796-9160
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West Columbia, South Carolina
October 6, 2015

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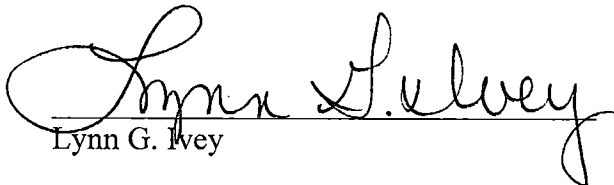
Town of Chapin, South Carolina; and
County of Lexington, South Carolina, Respondents.

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, PA certify that I have served the Motion for Extension to File Record on Appeal, on counsel of record for Respondents in this action by depositing a copy of same in the US Mail, postage prepaid, on October 7, 2015 to:

Daniel R. Settana, Jr., Esq.
Temus C. Miles, Jr., Esq.
Richard Eugene Marsh, III, Esq.
McKay, Cauthen, Settana
& Stublely, PA
P.O. Box 7217
Columbia, SC 29202

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


Lynn G. Ivey

West Columbia, South Carolina
October 7, 2015

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S. Jahue Moore†
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley†
Sheila McNair Robinson
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C. David Sawyer, Jr.
William H. Edwards
Stanley L. Myers
Jane H. Downey*
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Sarah Taylor Cassidy
Gregory R. Close

Robert D. Hazel
OF COUNSEL
Billy C. Coleman
RETIRED

October 7, 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,
Respondents
Appellate Case No. 2015-000329

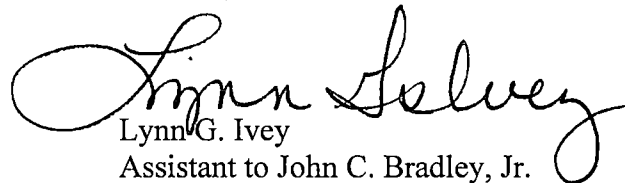
Dear Ms. Kitchings:

Enclosed for filing please find an original and four copies of Appellant's Motion for Extension to File Record on Appeal. I would appreciate your returning to 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 for Extension.

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.

Sincerely,


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

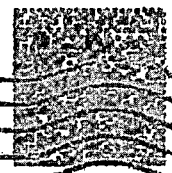
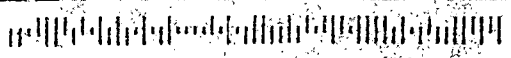
Enclosures

cc: Daniel R. Settana Jr., Esq.
Richard Eugene Marsh, III, Esq.
Temus C. Miles, Jr., Esq.
Jeffrey M. Anderson, Esq.
S. Jahue Moore, Esq. (Via Email)

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The Honorable Jenny Abbott Kitchings
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