

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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OCT 16 2015

SC Court of Appeals

Appeal From York County
Honorable John C. Hayes, III, Circuit Court Judge
Appellate Case No. 2014-002340

The City of Rock Hill, Appellant,

vs.

Brenda Stroupe, Respondent.

MOTION TO EXTEND TIME TO FILE REPLY BRIEF

The Respondent, Brenda Stroupe, hereby moves for an extension of thirty (30) days to file her brief in the above entitled matter. This is the third request for an extension in this matter. This extension is not intended for the purpose of delay. Respondent's counsel has had and continues to have multiple trials scheduled in General Sessions Court, as well as several other courts on a weekly basis. Additionally, counsel's minor child has had numerous doctor visits which have taken a significant amount of time as they are located in Charlotte, North Carolina and involve travel time as well as the time spent consulting with the doctors involved. Respondent's counsel has conferred with the counsel for the Appellant, Christopher E. A. Barton, who does not object to this request for an extension.

Respectfully submitted:



CHRISTOPHER A. WELLBORN
S. C. Bar No. 11914

Post Office Box 10191
Rock Hill, South Carolina 29731
(803) 366-1065

ATTORNEY FOR RESPONDENT

STATE OF SOUTH CAROLINA

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Appeal From York County
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The City of Rock Hill,

Appellant,

vs.

Brenda Stroupe,

Respondent.

PROOF OF SERVICE

I, Christopher A. Wellborn, certify that I have served the Motion to Extend Time to File Reply Brief on Appellant by depositing a copy of same in the United States mail, postage prepaid, addressed to:

Christopher E. A. Barton
Senior City Solicitor
Rock Hill Municipal Court
201 E. Main Street, 3rd Floor
Rock Hill, South Carolina 29730

I further certify that all parties required by Rule to be served have been served.

This 14th day of October, 2015



CHRISTOPHER A. WELLBORN
Post Office Box 10191
Rock Hill, South Carolina 29731
(803) 366-1065
S. C. Bar No. 11914

ATTORNEY FOR RESPONDENT

CHRISTOPHER A. WELLBORN, P.A.
ATTORNEY AT LAW

MAILING ADDRESS:

POST OFFICE BOX 10191
ROCK HILL, S.C. 29731
PHONE: (803)366-1065
EMAIL: CAWLAW@COMPORIUM.NET

LOCATION:

142 OAKLAND AVE. STE. C
ROCK HILL, S. C. 29730
FAX: (803)980-0952

October 14, 2015

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: City of Rock Hill, Appellant, v. Brenda Stroupe, Respondent
Appellate Case No. 2014-002340

Dear Ms. Kitchings:

Enclosed please find for filing the original and six copies of Respondent's Motion to Extend Time to File Reply Brief, along with Certificate of Service, regarding the above referenced case. By copy of this letter, I am herewith serving a copy of same on other counsel of record.

With kindest regards, I remain

Sincerely,



Christopher A. Wellborn
Attorney for Respondent
S.C. Bar No. 11914

CAW/aww
Enclosure:

cc: Christopher E. A. Barton (w/enclosure)
Senior City Solicitor
Rock Hill Municipal Court

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ROCK HILL, S.C. 29730

TO THE HONORABLE JENNY ABBOTT KITCHINGS
CLERK OF COURT
SOUTH CAROLINA COURT OF APPEALS
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