

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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

RECEIVED
OCT 22 2015
SC Court of Appeals

The City of Rock Hill,

Appellant,

vs.

Brenda Stroupe,

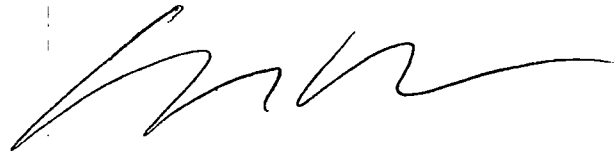
Respondent.

AMENDED MOTION TO EXTEND TIME TO FILE REPLY BRIEF

The Respondent, Brenda Stroupe, hereby moves for an extension of thirty (30) days from today's date (October 21, 2015) to file her brief in the above entitled matter. This is a renewal of the Motion to extend time filed on October 14, 2015. In that Motion, we requested a thirty day extension. We received the Order granting that Motion today, October 21, 2015 but the Order extended the time to file not the thirty days but for seven (7) days. As indicated in our Motion of October 14, 2015, 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. Additionally, Respondent's counsel is attending the Board Meeting of the National Association of Criminal Defense Lawyers Thursday, October 21, 2015 through Sunday,

October 25, 2015 in New York as a member of the Board and treasurer of the organization. Counsel is also scheduled for both a pre-trial hearing and a trial in Anderson, South Carolina next week as well as appearances in General Sessions. This counsel wishes to submit a brief but simply cannot do so within the seven (7) days allotted by the Order. 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:

A handwritten signature in black ink, appearing to read 'C. Wellborn', written in a cursive style.

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
IN THE COURT OF APPEALS

RECEIVED

OCT 22 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.

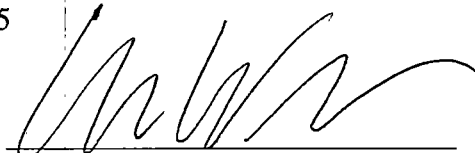
PROOF OF SERVICE

I, Christopher A. Wellborn, certify that I have served the Amended 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 21st 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