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STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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DEC 29 2015  
SC COURT OF APPEALS

Appeal from Horry County

The Honorable Clifton B. Newman, Circuit Court Judge

PAUL CURRY.....APPELLANT,

V.

TOWN OF ATLANTIC BEACH.....RESPONDENT.

APPELLATE CASE NO.: 2015-001398

**MOTION FOR AN EXTENSION  
AND TO FILE INITIAL BRIEF  
OUT OF TIME**

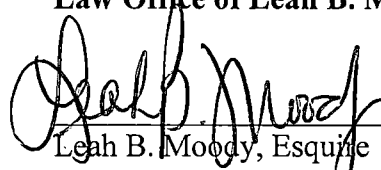
Counsel for Town of Atlantic Beach respectfully moves to file an extension request out of time.

In support of this petition, counsel shows:

- (1) The petition for the initial brief of appellant were due to filed on November 14, 2015.
- (2) Counsel requested an extension until December 14, 2015.
- (3) Subsequently, due to staff changes, counsel has not be able to complete her initial reply brief by the extension and inadvertently failed to file her request by the due date of the Court, December 14, 2015.

For these reasons, counsel for respondent asks the Court to allow a 30 days extension and requests to be filed out of time.

Respectfully submitted,  
**Law Office of Leah B. Moody, LLC**

A handwritten signature in black ink, appearing to read "Leah B. Moody", is written over a horizontal line.

Leah B. Moody, Esquire  
235 E. Main Street, Suite 115  
Post Office Box 1015  
Rock Hill, South Carolina 29731

Attorney for Respondent

December <sup>22</sup>, 2015  
Rock Hill, S.C.

# Law Office of Leah B. Moody, LLC

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Telephone (803) 327-4192  
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December 23, 2015

Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

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SC Court of Appeals

**Re: Paul Curry v. Town of Atlantic Beach**  
**Appellate Case No.: 2015-001398**

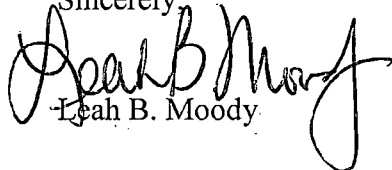
Dear Ms. Kitchings:

Please find enclosed my **Motion for a 30-day Extension and to File Out of Time** within which to serve and file the Initial Brief of Respondent and Designation of Matter in the above-referenced case. This is my second request for an extension in this case. Also, please find enclosed a check for \$25.00 and another check \$25.00, which I inadvertently did not enclose for the first request.

I attempted to reach Appellant Counsel, Randall K. Mullins on two occasions and have not received a returned call. I spoke with his office and left a message asking him if he opposed the request. By copy of this letter, I am serving him with this motion as well.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Leah B. Moody

Enclosures

Cc: Town of Atlantic Beach  
Randall Mullins, Attorney for Appellant

LAW OFFICE OF LEAH B. MOODY, LLC  
235 E. Main Street, Suite 115  
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The Honorable Jenny Abbott Kitchings  
c/o V. Claire Allen, Deputy Clerk  
PO Box 11629  
Columbia SC 29211-1629

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