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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Common Pleas Court

William P. Keesley, Circuit Court Judge

RECEIVED

JAN 11 2016

SC Court of Appeals

Appellate Case No. 2015-001153
Civil Action No. 2012-CP-32-0342

Kay F. PaschalRespondent-Appellant,

v.

Leon Lott, the Duly Elected Sheriff of
Richland County, South Carolina Appellant-Respondent.

**MOTION TO EXTEND TIME TO FILE RESPONDENT-APPELLANT'S
INITIAL BRIEF AND DESIGNATION OF MATTER**

The Respondent-Appellant Kay F. Paschal, respectfully moves this Court for an extension of time to file and serve her Initial Appellant's Brief and Designation of Matter to be Included in the Record on Appeal.

The Respondent-Appellant Paschal's motion is based on the grounds that the Attorney initially working on this matter left the firm for another position. This change resulted in confusion as to the parties to the appeal, their posture in this appeal and associated deadlines, giving rise to an inadvertent delay in filing the initial brief and designation of matter. Counsel for Respondent-Appellant Paschal requires additional

time to complete the preparation of the Initial Appellant's Brief and her Designation of Matter to be Included in the Record on Appeal.

WHEREFORE, the Respondent-Appellant Paschal respectfully requests that she be allowed until February 12, 2016, by which to file and serve her Initial Appellant's Brief and Designation of Matter to be Included in the Record on Appeal.

MOORE TAYLOR LAW FIRM, PA

BY: 

S. Jahue Moore,
Post Office Box 5709
West Columbia, South Carolina 29171
(803) 796-9160
Attorney for Respondent-Appellant
Kay F. Paschal

West Columbia, South Carolina
January 11, 2016

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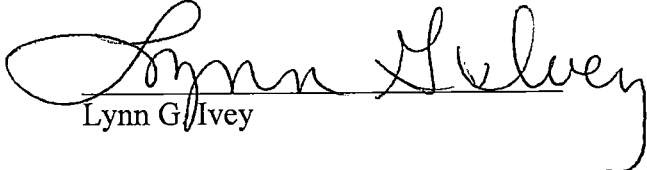
Leon Lott, the Duly Elected Sheriff of
Richland County, South Carolina Appellant-Respondent.

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of the Moore Taylor Law Firm, P.A., certify that I have served the Respondent-Appellant's Motion to Extend Time to File Initial Brief and Designation of Matter, by United States mail, in an envelope with sufficient postage affixed thereto, upon all counsel of record on January 11, 2016.

Andrew W. Lindemann, Esquire
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Davis Frawley, LLC
P. O. Box 489
Lexington, SC 29071-0489


Lynn G. Ivey

West Columbia, South Carolina
January 11, 2016

January 11, 2016

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29201

RE: Kay F. Paschal v. Leon Lott, the Duly Elected Sheriff of Richland
County, South Carolina
Appellate Case No. 2015-001153
C/A No. 2012-CP-32-00342

Dear Ms. Kitchings:

Enclosed please find the original and five (5) copies of Respondent-Appellant's Motion to Extend Time to File Initial Brief and Designation of Matter in the above referenced matter. We also enclose our firm's check for \$25.00 for payment of the filing fee. We would appreciate it if you would please file the original and return the extra copies via our courier.

By copy of this letter I am notifying all parties involved of this communication and serving them with the same.

Thank you for your assistance in this matter. If you have any questions or need any additional information and/or documentation, please do not hesitate to contact my office.

Sincerely,



S. Jahue Moore, Esquire

/lgi

Enclosures

cc: Andrew F. Lindemann, Esquire
Patrick J. Frawley, Esquire

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SC Court of Appeals

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