

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

78457

Appeal from Dorchester County
Court of Common Pleas

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JAN 19 2016

Diane Schafer Goodstein, Circuit Court Judge
SC Court of Appeals

Appellate Case No. 2015-000058
Trial Court Case No. 2013-CP-18-00735

William McFarland and Jennifer McFarland,

Appellants,

v.

Mansour Rashtchian and Amy Rashtchian,

Respondents.

**MOTION FOR EXTENSION OF TIME
TO SERVE/FILE RECORD ON APPEAL**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488
Attorneys for Appellants

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA
COURT OF APPEALS:

Come now the Appellants, William McFarland and Jennifer McFarland, and respectfully request a ten (10) day extension to serve/file the Record on Appeal in the above-referenced case. It is hoped that this extension will allow for the parties to work together to determine if any of the designated documents for inclusion in the Record on Appeal can be omitted in light of the Rashtchians' cross-appeal having been dismissed. Additionally, more time is needed to ensure that Appellants' counsel has obtained accurate copies of all documents designated by Respondents.

Appellants' counsel submits that the extension requested herein is reasonable under the circumstances, will work no undue prejudice on Respondents, and is in the interests of justice and judicial economy.

Wherefore Appellants request that the time for serving/filing the Record on Appeal be extended by 10 days from today, i.e., through January 25, 2016, and that the present Record on Appeal deadline be held in abeyance pending the Court's action on this motion.

Signature block on next page

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

Charleston, South Carolina 29401

P.O. Box 993 (29402)

(843) 720-5488

Attorneys for Appellants

Charleston, South Carolina

Dated: 1/14/16

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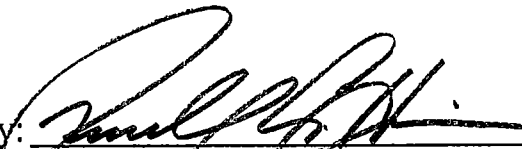
PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488
Attorneys for Appellants

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants above named, do hereby certify that I have served the **Motion for Extension of Time to Serve/File Record on Appeal** on the above-named Respondents by depositing a copy of the same in the United States Mail, postage prepaid, on January 14, 2016, addressed as follows to their counsel of record:

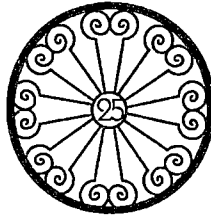
David C. Cleveland, Esquire
Michael L. Leech, Esquire
Clawson & Staubes, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492-7595

YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines

Charleston, South Carolina

Dated: 1/14/16



YCR LAW

Young Clement Rivers, LLP

CELEBRATING 50 YEARS OF LEGAL SERVICE

50 YEARS

Aimee M. Justman
Legal Assistant

Direct Dial: (843) 720-5460
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E-mail: Ajustman@ycrlaw.com

January 14, 2016

VIA US MAIL AND FACSIMILE

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: William McFarland and Jennifer McFarland v. Mansour Rashtchian and Amy Rashtchian
Appellate Case No.: 2015-000058
Circuit Court Case No.: 2013-CP-18-0735
YCR File: 15508-20150131

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of a Motion for Extension of Time to Serve/File the Record on Appeal and one (1) copy of a Proof of Service regarding the same. Also enclosed is a firm check in the amount of \$25.00 to cover the costs associated with this request.

Kindly file the originals and return one court-stamped copy to me using the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Aimee M. Justman
Legal Assistant

/amj

Enclosures

cc: Michael L. Leech, Esquire, Clawson & Staubes, LLC
David C. Cleveland, Esquire, Clawson & Staubes, LLC

Hasler

FIRST-CLASS MAIL

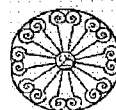
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20150131

Jenny Abbott Kitchings, Clerk of
Court
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SC Court of Appeals

