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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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FEB 04 2016
SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Common Pleas Court

William P. Keesley, Circuit Court Judge

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 Respondent'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 Counsel for Respondent-Appellant Paschal requires additional time to complete the preparation of the Initial Respondent's Brief and her Designation of Matter to be Included in the Record on Appeal. This is her first Motion for an Extension of Time to file her Respondent-Appellant's Brief.

WHEREFORE, the Respondent-Appellant Paschal respectfully requests that she be granted an additional thirty (30) days to file her Respondent's Brief and therefore be allowed until February 27, 2016 by which to file and serve her Initial Respondent'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 28, 2016

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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 Respondent's Brief and Designation of Matter, by United States mail, in an envelope with sufficient postage affixed thereto, upon all counsel of record on January 28, 2016.

Andrew W. Lindemann, Esquire
Davidson & Lindemann, PA
P.O. Box 8568
Columbia, SC 29202-8568

Patrick J. Frawley, Esquire
Davis Frawley, LLC
P. O. Box 489
Lexington, SC 29071-0489



Lynn G. Wey

West Columbia, South Carolina
January 28, 2016

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SC Court of Appeals

January 28, 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

S. Jahue Moore*
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley*
Sheila McNair Robinson
Christian G. Spradley
C. David Sawyer, Jr.
William H. Edwards
Stanley L. Myers
Jane H. Downey*
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Sarah Taylor Cassidy
Gregory R. Close

Robert D. Hazel
OF COUNSEL
Billy C. Coleman
RETIRED

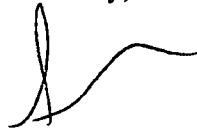
Dear Ms. Kitchings:

Enclosed please find the original and five (5) copies of Respondent-Appellant's Motion to Extend Time to File Initial Respondent's 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 the enclosed self addressed, stamped envelope.

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



First Class Mail

MTI MOORE | TAYLOR
LAW FIRM

PO Box 5709, West Columbia SC 29171
1700 Sunset Boulevard, West Columbia SC 29169

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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