

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Common Pleas Court

William P. Keesley, Circuit Court Judge

Appellate Case No. 2015-001153

RECEIVED

FEB 10 2016

SC Court of Appeals

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 second extension of time to file and serve her Initial Appellant's Brief and Designation of Matter to be Included in the Record on Appeal. By previous Order of the Court, the time for Respondent-Appellant to file her Initial Appellant's Brief was extended to February 12, 2016. Respondent-Appellant respectfully requests and additional thirty (30) days to file her Initial Appellant's Brief making it due on or before March 14, 2016.

The Respondent-Appellant Paschal's motion is based on the grounds that, due to an extremely heavy workload involving out of State depositions and related travel, counsel for Respondent-Appellant needs additional time to assimilate the lengthy Trial

Transcript and to adequately prepare the Respondent Appellant's Initial Appellant's Brief and Designation of Record. This motion is not made to delay this appeal. Counsel for the Respondent-Appellant has informed counsel for Appellant-Respondent of this request and he consents.

WHEREFORE, the Respondent-Appellant Paschal respectfully requests that she be allowed until March 14, 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
February 8, 2016

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Kay F. PaschalRespondent-Appellant,

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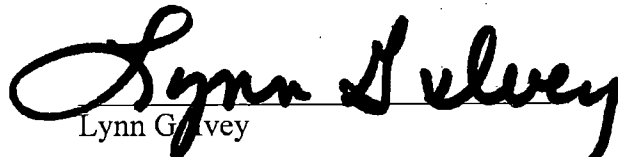
Leon Lott, the Duly Elected Sheriff of
Richland County, South Carolina Appellant-Respondent.

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 February 8, 2016.

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Columbia, SC 29202-8568

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Lexington, SC 29071-0489


Lynn G. Ivey

West Columbia, South Carolina
February 8, 2016

February 8, 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

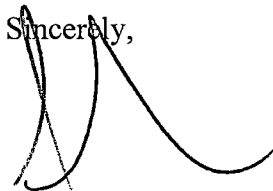
Dear Ms. Kitchings:

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

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

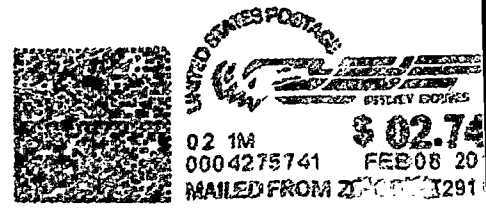
Enclosures

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

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SC Court of Appeals

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First Class Mail

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The Honorable Jenny Abbott Kitchings
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