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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2012-CP-40-07273
Appellate Case No. 2014-000961

RECEIVED

MAR 02 2016

SC Court of Appeals

Betty J. Keitt.....Appellant,

v.

City of Columbia.....Respondent.

**MOTION FOR FIRST EXTENSION OF TIME TO FILE
APPELLANT'S PETITION FOR REHEARING**

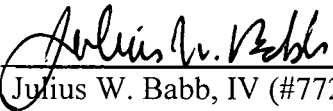
The Appellant, Betty J. Keitt, through her undersigned counsel, hereby requests of this Honorable Court an extension of time in which to file Appellant's Petition for Rehearing in the above referenced matter. Plaintiff's counsel did not receive the February 17, 2016 Order until February 22, 2016 which is 5 days after it was issued and that counsel's schedule has made it difficult to complete it within the remaining time.

Pursuant to the grounds listed above, the undersigned respectfully requests seven (7) day extension in which to prepare Appellant's Petition for Rehearing. A seven (7) day extension would move this deadline from Thursday, March 3 to Monday, March 10, 2016. The undersigned certifies that this motion for extension is not being done as a delaying tactic and is

in the furtherance of justice for Appellant. The undersigned counsel consulted with counsel for Respondent for the extension of time to reply. Respondent's counsel consented to this Motion for First Extension of Time to File Appellant's Petition for Rehearing.

Respectfully Submitted,

J. LEWIS CROMER & ASSOCIATES, L.L.C.

BY: 
Julius W. Babb, IV (#77216)
1418 Laurel Street, Suite A
Post Office Box 11675
Columbia, South Carolina 29211
Phone 803-799-9530
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Attorneys for Appellant

March 2, 2016
Columbia, South Carolina

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Betty J. Keitt.....Appellant,

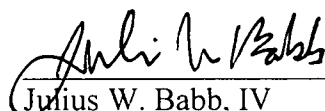
v.

City of Columbia.....Respondent.

PROOF OF SERVICE

This is to certify that the undersigned employee of J. Lewis Cromer & Associates, LLC, did cause to have served on March 2, 2016, a copy of the **MOTION FOR FIRST EXTENSION OF TIME TO FILE APPELLANT'S PETITION FOR REHEARING**, via First Class Mail, postage prepaid, to the following counsel of record, at the below indicated address:

W. Allen Nickles, III, Esquire
The Nickles Law Firm
1122 Lady Street, Suite 610
Columbia, South Carolina 29202



Julius W. Babb, IV
J. Lewis Cromer & Associates, LLC
1418 Laurel Street
Post Office Box 11675
Columbia, South Carolina 29211
Phone 803-799-9530

March 2, 2016
Columbia, SC

J. LEWIS CROMER & ASSOCIATES L.L.C.

ATTORNEYS AND COUNSELORS AT LAW

J. LEWIS CROMER
JULIUS W. BABB, IV • J. PAUL PORTER • ASHLEY C. STORY
RYAN K. HICKS • SHANNON M. POINI • CHELSEA R. RIKARD

March 2, 2016

HAND-DELIVERED

Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

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MAR 02 2016

SC Court of Appeals

Re: Betty Keitt v. City of Columbia
Case No.: 2012-CP-40-7273
Appellate Case No. 2014-000961

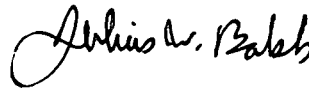
Dear Ms. Kitchings:

Please find enclosed the original and one copy of Motion for First Extension of Time to File Appellant's Petition for Rehearing in connection with the above referenced matter. We have also enclosed our firm's check in the amount of \$25.00, representing the filing fee of same. Please file the original and return the clocked copy to the employee delivering the document to the Court.

By copy of this letter and enclosures to Respondent's counsel of record, I am serving same on him.

With kind regards, I remain

Sincerely,



Julius W. Babb, IV

JWB/iwr
Enclosures

cc: Al Nickles, Esquire (w/enclosures)
Betty Keitt