

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
Civil Action No. 2012-CP-32-0342

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APR 01 2016

SC Court of Appeals

79135

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 COUNTER-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 Counter-Designation of Matter to be Included in the Record on Appeal. The Brief and Counter-designation are due on or before April 4, 2016.

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 Counter-Designation of Matter to be Included in the Record on Appeal.

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 May 4, 2016, by which to file and serve her Initial Respondent's Brief and Counter-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
March 31, 2016

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Kay F. PaschalRespondent/Appellant,

v.

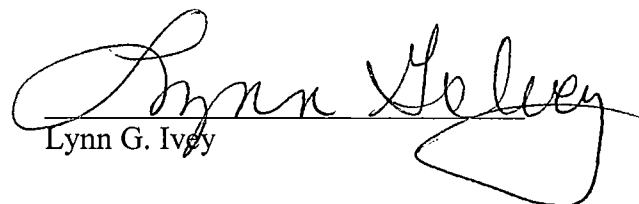
Leon Lott, the Duly Elected Sheriff of
Richland County, South Carolina Appellant/Respondent.

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 Her Initial Respondent's Brief and Counter-Designation of Matter, by United States mail, in an envelope with sufficient postage affixed thereto, upon all counsel of record on April 1, 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. Ivey

West Columbia, South Carolina
April 1, 2016

April 1, 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

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SC Court of Appeals

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 Respondent's Initial Brief and Counter-Designation of Matter in the above referenced matter. We would appreciate your filing the original and returning the extra copies by way of our courier. I have enclosed our firm check for \$25.00 with this filing.

By copy of this letter I am providing counsel with a copy of 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 our office.

Sincerely,



Lynn G. Ivey
Assistant to John C. Bradley, Jr.

Enclosures

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