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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

MAY 09 2016

APPEAL FROM DILLON COUNTY  
Court of Common Pleas

**SC Court of Appeals**

The Honorable Richard L. Hinson, Special Referee

Case No. 2016-000246

Thomas J. Grossetti, Jr., .....Respondent,

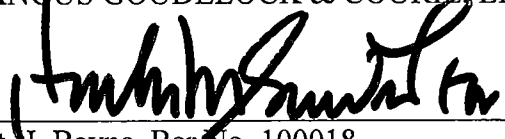
v.

Nicolette S. Blue, .....Appellant.

**APPELLANT'S MOTION FOR EXTENSION OF TIME**

Appellant, Nicolette S. Blue, hereby moves for an extension of time in which to file Appellant's Initial Reply Brief. The Appellant's Initial Reply Brief is currently due on May 13, 2016. Counsel seeks a thirty day extension in order due to Appellant's counsel having surgery scheduled for May 6, 2016 and being out of the office following for recovery purposes. This is Appellant's first request for an extension.

McANGUS GOUDELOCK & COURIE, LLC



Brett H. Bayne, Bar No. 100018  
Post Office Box 12519, Capitol Station  
Meridian, 1320 Main Street, 10<sup>th</sup> Floor (29201)  
Columbia, South Carolina 29211-2519

May 6, 2016

*Attorney for Appellant, Nicolette S. Blue*

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APPEAL FROM DILLON COUNTY  
Court of Common Pleas

**SC Court of Appeals**

The Honorable Richard L. Hinson, Circuit Court Judge

Case No. 2016-000246

Thomas J. Grossetti, Jr., ..... Respondent,

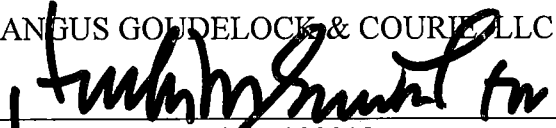
v.

Nicolette S. Blue, ..... Appellant.

**PROOF OF SERVICE**

I certify that I have caused to be served on May 6, 2016, Appellant's Motion for Extension of Time in this action on counsel of record by mailing it to him, at his last known address, by depositing it in the U.S. Mail, in an envelope with sufficient postage affixed, addressed as follows: George D. Jebaily, Jebaily Law Firm, P.A., Post Office Box 1871, Florence, South Carolina 29201.

McANGUS GOLDELOCK & COURIE, LLC

  
Brett H. Bayne, Bar No. 100018  
Post Office Box 12519, Capitol Station  
Meridian, 1320 Main Street, 10<sup>th</sup> Floor (29201)  
Columbia, South Carolina 29211-2519  
(803) 779-2300

May 6, 2016

*Attorney for Appellant, Nicolette S. Blue*

**Reply To**

BRETT H. BAYNE  
Direct Dial: (803) 227-2281  
brett.bayne@mgclaw.com

May 6, 2016

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

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SC Court of Appeals

RE: Thomas J. Grossetti, Jr. vs. Nicolette S. Blue  
Civil Action No.: 2016-000246  
Date of Incident: May 17, 2013  
Carrier Claim No.: 2013-71804  
MGC File No.: 20777.15054

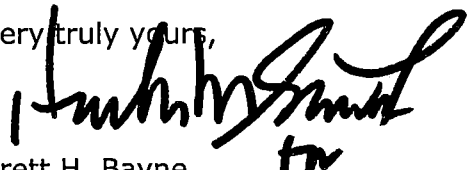
Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of Appellant's Motion for Extension of Time in the above-captioned case. I would appreciate your returning a clocked-in copy of the same to me in the envelope provided.

By copy of this letter, I am serving counsel of record with the above-referenced Appellant's Motion for Extension of Time.

Thanking you in advance for your assistance, I am,

Very truly yours,

  
Brett H. Bayne

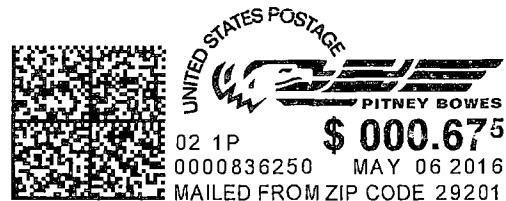
BHB/cmm

Enclosures

cc: George D. Jebaily, Esquire (w/ enc.)

**mgc**

POST OFFICE BOX 12519  
COLUMBIA, SC 29211



**20777.15054/BHB/cmm**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

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SC Court of Appeals

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