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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
William P. Keesley, Circuit Court Judge

RECEIVED
MAY 31 2016
SC Court of Appeals

Case No. 2012-CP-32-0342

Kay Paschal Wallace, Respondent-Appellant,

v.

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

**APPELLANT-RESPONDENT'S MOTION FOR EXTENSION
TO FILE INITIAL REPLY BRIEF**

The Appellant-Respondent Leon Lott, respectfully moves this Court for an additional extension of time of five days until May 31, 2016, by which to file and serve his Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellant-Respondent Lott's motion is based on the following grounds:

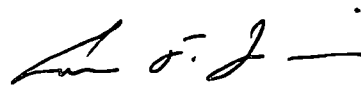
1. The Initial Reply Brief is currently due to be filed and served on May 26, 2016.

2. The undersigned counsel for the Appellant-Respondent Lott requires additional time to complete the preparation of the Initial Appellant's Brief and his Designation of Matter to be Included in the Record on Appeal because other obligations and deadlines that have prevented him from completing the Initial Brief Appellant's by the current deadline. Specifically, the undersigned counsel was out of the office in Beaufort and Myrtle Beach from May 23-26, 2016 for depositions and motion hearings. As a result, the undersigned counsel was unable to complete the preparation of the Initial Reply Brief by the current May 26th deadline.

3. The undersigned counsel was unable to consult with opposing counsel prior to filing this motion, but it is expected that counsel will consent to this extension given the history in this litigation.

WHEREFORE, the Appellant-Respondent Lott respectfully requests that he be allowed until May 31, 2016, by which to file and serve his Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

DAVIDSON & LINDEMANN, P.A.

BY:  _____

ANDREW F. LINDEMANN
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1611 Devonshire Drive
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(803) 806-8222

*Counsel for Appellant-Respondent
Leon Lott*

Columbia, South Carolina

May 26, 2016

CERTIFICATE OF SERVICE

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SC Court of Appeals

The undersigned employee of Davidson & Lindemann, P.A., counsel for the Appellant-Respondent, Leon Lott, does hereby certify that service of **Appellant-Respondent's Motion for Extension to File Initial Reply Brief** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 26th day of May 2016:

S. Jahue Moore, Esquire
Moore Taylor Law Firm, P.A.
Post Office Box 5709
West Columbia, South Carolina 29171

Patrick J. Frawley, Esquire
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May 26, 2016

Of Counsel
Kenneth P. Woodington

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MAY 31 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Kay Paschal v. Leon Lott, the Duly Elected Sheriff of Richland County,
South Carolina
Appellate Case Number: 2015-001153
Civil Action Number: 2012-CP-32-0342
Our File Number: 314.9502

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of **Appellant-Respondent's Motion for Extension to File Initial Appellant's Brief** in the above referenced matter. Please file the original and return a clocked-in copy to me in the enclosed envelope. I have enclosed a \$25 check for the filing fee.

By copy of this letter, I am serving a copy on all counsel of record. Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

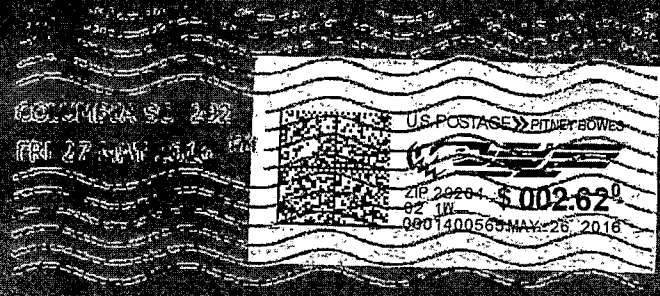
AFL/
Enclosure

The Honorable Jenny Abbott Kitchings
May 26, 2016
Page Two

cc: (w/ Enclosures)

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