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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

JUL 08 2016

SC Court of Appeals

J.C. Nicholson, Circuit Court Judge

Case No. 2014-001871

City of North Charleston, Respondent,

v.

John Barra, Appellant.

REQUEST FOR EXTENSION OF TIME TO FILE RETURN

The Respondent, City of North Charleston, requests a fifteen (15) day time extension so that the City of North Charleston may adequately prepare the Return to Appellant's Petition for Rehearing. This petition was received on Friday July 1 of this year prior to a week-long family vacation previously scheduled by both Joseph Matthew Kaiser and Samantha Jean Vaughn, Esquires for the City. Appellant's counsel has consented to this first continuance request.

July 6, 2016



Frances D. Austin
Post Office Box 190016
North Charleston, S.C. 29419
(843) 740-5830
Attorney for Appellant
S.C. Bar # 77942

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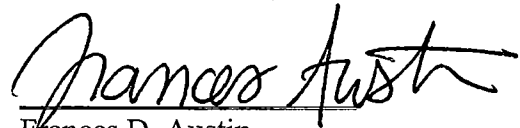
John Barra,

Appellant.

PROOF OF SERVICE

I certify that I have served the Request for Extension of Time on John Barra by depositing a copy of it in the United States Mail, postage prepaid, on July 6, 2016 addressed to his attorney of record, Thomas C. Nelson, 1004 Anna Knapp Blvd., 2nd Floor, Mount Pleasant, South Carolina 29464.

July 6, 2016



Frances D. Austin
Post Office Box 190016
North Charleston, S.C. 29419
(843) 740-5830
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July 6, 2016

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

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Re: City of North Charleston v. John Barra
Appeal No. 2014-001871

Dear Clerk,

Enclosed for filing is the original and six (6) copies of a Motion for an Extension of Time along with my certificate of service and the \$25.00 filing fee. We have contacted Counsel for the Appellant, who has graciously consented to the extension request.

Thank you for consideration of this request,

Sincerely,



Frances Austin



City of North Charleston
PO Box 190016 • North Charleston, SC • 29419-9016

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SC Court of Appeals

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