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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**  
AUG 03 2016  
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Thomas A. Russo, Circuit Court Judge

Case No.: 2014-CP-40-5976  
Appellate Case No.: 2016-000505

Tracy Fulmore.....Appellant,

v.

Julie Smith.....Respondent.

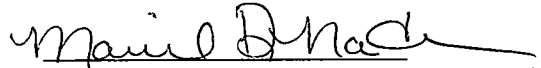
**RESPONDENT'S SECOND MOTION FOR EXTENSION OF  
TIME TO FILE AND SERVE INITIAL BRIEF, DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL, AND PROOF OF SERVICE**

Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, Respondent Julie Smith hereby moves for a second extension of time of thirty (30) days to serve and file her Initial Brief, Designation of Matter to be Included in the Record on Appeal, and the Proof of Service thereof on the Appellant in the above-referenced case. To date, the Respondent has requested an extension of time via a Motion to Request Extension which was filed June 29, 2016. The basis of this request was for Respondent to find and hire legal counsel to represent her in the above-referenced case. The Court granted Respondent's motion via an Order filed June 30, 2016, extending the deadline for Respondent's Initial Brief and Designation of Matter until August 10, 2016. Respondent respectfully requests an additional extension of time until September 9, 2016.

Respondent had difficulty locating an attorney to represent her in this type of matter. Respondent recently hired undersigned counsel to represent her in this appeal, and this extension of time is needed for her counsel to review the materials from the lower court actions and prepare the Initial Brief and Designation of Matter.

The counsel for the Respondent has consulted with the counsel for the Appellant, and counsel for the Appellant has not informed undersigned counsel whether Appellant consents to this Motion.

Respectfully submitted,



Mariel D. Norton (SC Bar No. 100198)  
Catherine Garbee Griffin (SC Bar No. 9821)  
BAKER, RAVENEL & BENDER, L.L.P.  
Post Office Box 8057  
Columbia, South Carolina 29202  
(803) 799-9091  
(803) 779-3423  
*Attorneys for Respondent*

August 3, 2016

Other Counsel of Record:

Charles T. Brooks, III, Esquire  
The Brooks Law Office, LLC  
P.O. Box 3512  
Sumter, SC 29151  
(803) 418-5709  
*Attorney for Appellant*

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Tracy Fulmore.....Appellant,

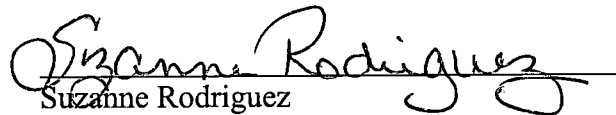
v.

Julie Smith.....Respondent.

**PROOF OF SERVICE**

I, Suzanne Rodriguez, Legal Assistant to Mariel D. Norton, an employee of Baker, Ravenel & Bender, L.L.P., Attorneys for Julie Smith, Respondent, hereby certify that, on this 3<sup>rd</sup> day of August 2016, I have served the following with the foregoing Respondent's Second Motion for Extension of Time to File and Serve Initial Brief of Respondent, Designation of Matter to be Included in the Record on Appeal, and Proof of Service by mailing copies of same by United States Mail, postage prepaid, to counsel of record at the addresses shown below:

Charles T. Brooks, III, Esquire  
The Brooks Law Office, LLC  
P.O. Box 3512  
Sumter, SC 29151

  
Suzanne Rodriguez



**BAKER RAVENEL BENDER**

ATTORNEYS AT LAW

Mariel D. Norton  
[mnorton@brblegal.com](mailto:mnorton@brblegal.com)  
(803) 343-3860 – direct dial

August 3, 2016

**HAND DELIVERY**

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

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AUG 03 2016  
SC Court of Appeals

Re: Tracy Fulmore v. Julie Smith  
Case No. 2016-000505  
File No. 10891.0

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter are an original and seven (7) copies of Respondent's Second Motion for Extension of Time to File and Serve Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof. Please return a clocked copy of each document to me via the courier delivering same. I have also enclosed our firm check in the amount of \$25.00 for the filing fee.

By copy hereof, I am serving same upon counsel for Appellant.

Thank you very much.

Sincerely yours,

Mariel D. Norton  
MDN:sr  
Enclosures

cc: w/enclosure: Charles T. Brooks, III, Esquire