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**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM GEORGETOWN COUNTY
COURT OF COMMON PLEAS

THE HONORABLE BENJAMIN H. CULBERTSON
CIRCUIT COURT JUDGE

RECEIVED

AUG 08 2016

APPELLATE CASE NO. 2016-000251
CIVIL ACTION NO. 2009-CP-22-0325

SC Court of Appeals

Willie Singleton and Julia Thomas, Heirs at Law
of Victoria Gadson, deceased,

PLAINTIFFS,

versus

City of Georgetown Building Official Stephen Stack, Mayor
Lynn Wood Wilson, Mayor Pro Temp Brendon M. Barber, Sr.,
Council Member Peggy P. Wayne, Council Member Clarence Smalls,
Council Member Paige B. Sawyer, III, Council Member Rudolph A.
Bradley, Council Member Jack Scoville, Director of Building Planning
Sabrina Morris, Steve Thomas, City Administrator, and
The City of Georgetown;

DEFENDANTS,

Of whom Willie Singleton is the

APPELLANT/RESPONDENT,

and

The City of Georgetown is the

RESPONDENT/APPELLANT.

MOTION FOR EXTENSION OF TIME

The Initial Appellant's Brief of Respondent/Appellant, The City of Georgetown,
and Designation of Matter to be Included in the Record on Appeal were due on June 27,
2016. At the Respondent/Appellant's request, the Court granted an extension of time

until August 5, 2016 to serve and file the Respondent/Appellant's Initial Appellant's Brief and Designation of Matter. The Respondent/Appellant, The City of Georgetown, respectfully requests the Court to grant a second extension of time until August 19, 2016 to serve and file the Initial Appellant's Brief and Designation of Matter.

Counsel for the Respondent/Appellant requests an additional extension due to a heavy workload which has included the preparation of a Supplemental Record on Appeal with this Court, the filing of an Initial Respondent's Brief and Final Respondent's Brief in appeals pending before this Court, the filing of an appellee's brief with the United States District Court of South Carolina in a bankruptcy appeal, the filing of objections to a U.S. Magistrate Judge's Report and Recommendation in a case pending before the District Court of South Carolina, and the filing of an appellee's brief with the United States Court of Appeals for the Fourth Circuit.

Counsel has contacted counsel for Appellant/Respondent Willie Singleton, and she consents to this request as shown by Exhibit "A" attached hereto.

Accordingly, the Respondent/Appellant, The City of Georgetown, respectfully requests an extension of time until August 19, 2016 in which to serve and file the Initial Appellant's Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,



Douglas C. Baxter
RICHARDSON, PLOWDEN & ROBINSON, PA
2103 Farlow Street (29577)
Post Office Drawer 3646
Myrtle Beach, South Carolina 29578
(843) 448-1008

Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
**ATTORNEYS FOR
RESPONDENT/APPELLANT
THE CITY OF GEORGETOWN**

August 4, 2016.

EXHIBIT "A"

Carmen Ganjehsani

From: Bonnie Travaglio Hunt <bthunt@huntlawllc.com>
Sent: Monday, August 01, 2016 5:25 PM
To: Carmen Ganjehsani
Subject: Singleton

I have no objections to your request for extension in the Singleton v. Georgetown appeal.

Bonnie Travaglio Hunt

Carmen Ganjehsani


From: Carmen Ganjehsani
Sent: Monday, August 01, 2016 10:11 AM
To: 'bthunt@huntlawllc.com'
Subject: Singleton v. Georgetown

Ms. Hunt,

My two briefs in this cross-appeal are due this Friday, August 5. Because I have had briefs that I have filed with the District Court of South Carolina, the S.C. Court of Appeals, and the Fourth Circuit for the past few weeks, I have not been able to fully start working on this appeal until now. I was wondering if you would consent to a two week extension, until August 19, for me to file the two cross-appeal briefs in the Singleton appeal. I work part-time around my children's schedule, and this would give me some additional time once they head back to school.

Thank you for your consideration of this request in advance,

Carmen Ganjehsani

HOME	VCARD	LOCATION
	Carmen V. Ganjehsani Special Counsel Cganjehsani@RichardsonPlowden.com	
	Richardson Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 www.RichardsonPlowden.com	

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CERTIFICATE OF SERVICE

I, the undersigned, attorney for Respondent/Appellant, The City of Georgetown, do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated August 4, 2016, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Bonnie Travaglio Hunt
Hunt Law, LLC
PO Box 1845
Goose Creek, SC 29445
ATTORNEY FOR APPELLANT/RESPONDENT



Carmen V. Ganjehsani
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**ATTORNEYS FOR
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THE CITY OF GEORGETOWN**

Dated: August 4, 2016.

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Reply to: Carmen V. Ganjehsani
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

August 4, 2016

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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AUG 08 2016
SC Court of Appeals

Re: Willie Singleton v. The City of Georgetown
Appellate Case No. 2016-000251
Case No.: 2009-CP-220325
RPR File No.: 2047-223

Dear Ms. Kitchings:

I am enclosing for filing the original and six copies each of Respondent/Appellant The City of Georgetown's Motions for Extensions of Time to file the Initial Appellant's Brief and Designation of Matter to be Included in the Record on Appeal and the Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our Certificates of Service. Also enclosed are two firm checks in the amount of \$25.00 each to cover the filing fees for these Motions.

By copy of this letter, we are serving a copy of these Motions on counsel for the Appellant/Respondent Willie Singleton.

If you should have any questions, please do not hesitate to contact me.

Sincerely,



Carmen V. Ganjehsani

CVG
Encs.

cc: Bonnie Travaglio Hunt, Esquire (w/encs.)
Douglas C. Baxter (via e-mail)



ZIP 29201
011E11670150

2047-223

RICHARDSON
RICHARDSON PLOWDEN ROBINSON, P.A.
PLOWDEN
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
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