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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Appellate Case No.: 2016-001198

RECEIVED
AUG 17 2016
SC Court of Appeals

Kim Murphy Appellant

v.

Richland-Lexington School District 5 Board of Trustees, Bobby Merle Bowers, and Robert Gantt
, Respondent.

APPELLANT’S MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240 and 263(b) of the South Carolina Appellate Court Rules, Appellant Kim Murphy (“Appellant”), by and through her undersigned counsel, with the consent of the Respondents, Richland-Lexington School District 5 Board of Trustees, Bobby Merle Bowers, and Robert Gantt, requests an order granting Appellant a 30-day extension of time to file and serve her Initial Brief and Designation of Matter. This request is being made because: (1) both attorneys who were working on Appellant’s case are no longer associated with the law firm representing Appellant, and (2) the law firm representing Appellant has at least four or five upcoming trials for which the firm must prepare between now and the end of the year.

Due to the attorneys’ departure from the law firm, the senior attorney of the firm, an active member of the bar since 1959, has had to reassign Appellant’s case to his associates and

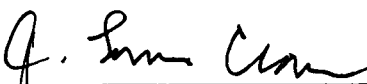
allow them sufficient time to review and work on Appellant's case. Although the senior attorney is, as far as he knows, still mentally and physically able to work on and prepare cases, he needs assistance from his associates because of the caseload of the firm and other obligations.

Furthermore, this is a complex case and may be a case of first impression as to whether an elected public official like Appellant can be arbitrarily removed in the middle of her term if the removal is not based on misconduct or job performance. A 30-day extension would allow Appellant's attorneys to have sufficient time to review Appellant's complex case and draft Appellant's Initial Brief and Designation of Matter.

Appellant's Initial Brief and Designation of Matter are currently due September 14, 2016. If the request is granted, Appellant's Initial Brief and Designation of Matter will be due October 14, 2016.

Opposing counsel is aware of Appellant's Motion for Extension of Time and has consented to the same.

J. LEWIS CROMER & ASSOCIATES, L.L.C.

By: 

J. Lewis Cromer (Fed. #1470)
Post Office Box 11675
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Attorney for Appellant

August 17, 2016

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

Appellate Case No.: 2016-001198

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SC Court of Appeals

Kim Murphy Appellant


v.

Richland-Lexington School District 5 Board of Trustees, Bobby Merle Bowers, and Robert Gantt
..... Respondent.

PROOF OF SERVICE

I certify that I have caused service of the Appellant’s Motion for Extension via United States Postal Service delivery, on August 17, 2016, to their attorneys of record, Michael Montgomery of Montgomery Willard, LLC, at P.O. Box 11886, Patrick Frawley of Davis Frawley, LLC, at 140 E. Main Street, Lexington, SC, and David L. Morrison of Morrison Law Firm, LLC, at 7453 Irmo Drive, Suite B, Columbia, SC.

J. LEWIS CROMER & ASSOCIATES, L.L.C.

By: 
J. Lewis Cromer (Fed. #1470)
Post Office Box 11675
Columbia, South Carolina 29211
(803) 799-9530
Attorney for Appellant

**J. LEWIS CROMER
& ASSOCIATES L.L.C.**

ATTORNEYS AND COUNSELORS AT LAW

J. Lewis Cromer
Julius W. Babb, IV · J. Paul Porter
Ryan K. Hicks · Shannon M. Polvi · Chelsea R. Rikard

August 17, 2016

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AUG 17 2016

SC Court of Appeals

Via Hand Delivery

Honorable Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
1220 Senate Street
Columbia, SC 29201

**Re: *Murphy v Richland-Lexington School District 5 et al.*
Appellate Case No. 2016-001198**

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Appellant's Motion for Extension of Time. Also, enclosed is the original and one copy of the Proof of Service, along with our firm's check in the amount of \$25.00. Please file the originals and return the clocked copies to our administrative assistant.

Should you have any questions and/or concerns, please feel free to call us. Thank you in advance for your assistance in this matter.

Sincerely,



Elizabeth Bowen
Law Clerk

CC: David Morrison, Esq.
Michael Montgomery, Esq.
Patrick Frawley, Esq.

J