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STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY
Court of Common Pleas
DeAndrea G. Benjamin, Circuit Court Judge

RECEIVED
AUG 22 2016
SC Court of Appeals

Case No. 2014-CP-28-00940
Appellate Case No. 2016-000804

Jean P. Derrick,

Respondent,

v.

Lisa C. Moore,

Appellant.

MOTION FOR EXTENSION OF TIME IN WHICH TO SERVE
AND FILE RESPONDENT'S INITIAL BRIEF AND DESIGNATION

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, respondent, Jean P. Derrick, by and through her undersigned counsel, files this motion for an extension of the deadline for serving and filing the respondent's initial brief and designation of matter to be included in the record on appeal, and in support of this motion says as follows:

1. The appellant's initial brief was served June 22, 2016, therefore the respondent's initial brief and designation of matter to be included in the record on appeal

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were originally due to be served and filed on July 22, 2016. Respondent sought and was granted a 30-day extension of this deadline, to August 22, 2016.

2. Because of a very heavy caseload at this time and a period of time out of the office in August because of prior travel commitments, Respondent's undersigned counsel will be unable to complete the initial brief and designation of matter by the August 22, 2016, deadline. Accordingly, counsel respectfully requests an additional 30-day extension of the deadline for the filing of respondent's initial brief and designation, to September 21, 2016.

3. This request is not made for the purpose of delay but because of the constraints of counsel's recent work schedule, and no prejudice will result to the appellant as the result of granting this request.

WHEREFORE, respondent hereby respectfully moves for a 30-day extension of time in which to serve and file respondent's initial brief and designation of matter to be included in the record on appeal, to September 21, 2016.

Respectfully submitted,



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Attorneys for Respondent

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PROOF OF SERVICE

I certify that I served a copy of the foregoing motion for extension of time in which to serve and file respondent's initial brief and designation, by mail, to appellant's counsel of record, Robert D. Dodson, Law Offices of Robert Dodson, P.A., 1722 Main Street, Suite 200, Columbia, South Carolina 29201, on August 22, 2016.


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