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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

SEP 07 2016

SC Court of Appeals

Thomas L. Hughston, Circuit Court Judge

Case No. 2015-CP-18-1308

Adrian Smalls,

Respondent,

v.

Brenda Lee Barnett,

Appellant.

**MOTION FOR EXTENSION OF
TIME TO FILE AND SERVE
APPELLANT'S INITIAL BRIEF
AND DESIGNATION OF MATTERS**

NOW COMES undersigned Counsel and moves this Court for an Order allowing an extension of time to file and serve the Appellant's Initial Brief and Designation of Matters on appeal. The grounds for the same include:

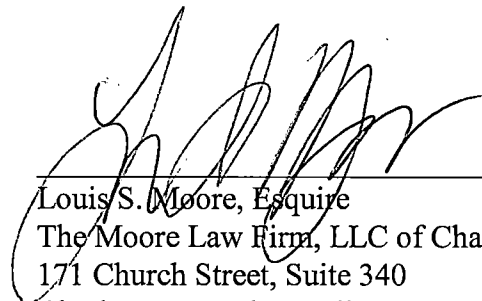
1. Appellant's Initial Brief and Designation of Matters were due on or about September 6, 2016.
2. Appellant Barnett has not previously requested an extension and the present request is of necessity due to occurrences neither planned nor the fault of Appellant.
3. Underlying the above-mentioned occurrences include Undersigned Counsel's efforts to being abruptly interrupted due to the recent deaths of two (2) family matters on Saturday, September 3 and Monday, September 5th. The deaths include counsel's wife's sister and her aunt.
4. As a result of the recent personal losses, undersigned counsel will be in North Carolina through the balance of this week and part of the following week attending services and allowing time with wife and family in this time of loss.

WHEREFORE, Counsel prays the Court will grant:

1. Extension of Time to File and Serve the Initial Brief and Designation of Matters.
2. Such other relief as may be appropriate.

I so Move!

This 6th day of September 2016.



Louis S. Moore, Esquire
The Moore Law Firm, LLC of Charleston
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Charleston, South Carolina 29407
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(843) 491-4438 (Fax)
lou@themoorelawfirmllc.com
Attorney for Appellant

Other Counsel of Record:
Kevin D. Hackler, Esquire
Theron W. Sandy II, Esquire
Attorneys for Respondent
3 Broad Street, 2d Floor
Charleston, South Carolina 29401

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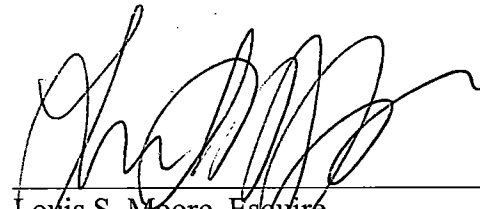
Brenda Lee Barnett,

Appellant.

PROOF OF SERVICE

I certify that I have served the foregoing Motion For Extension of Time to File Appellant's Initial Brief and Designation of Matters upon the Respondent by depositing a copy of it in the United States Mail, postage prepaid, on 6th day of September, 2016 addressed to his attorneys of record, Kevin D. Hackler and Theron W. Sandy, II 3 Broad Street, 2d Floor, Charleston, South Carolina 29401.

6th day of September, 2016



Louis S. Moore, Esquire
171 Church Street, Suite 340
Charleston, South Carolina 29401
(443) 469-4635
Attorney for Appellant

THE MOORE LAW FIRM, LLC

Of Charleston

September 6, 2016

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SEP 07 2016

SC Court of Appeals

RE: Adrian Smalls, Respondent vs Brenda Lee Barnett, Appellant,

Case No. 2016-000100

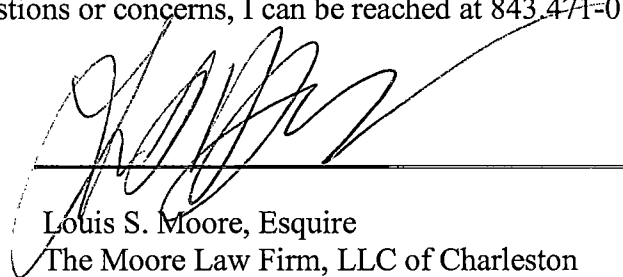
Withdrawal of Motion to Be Relieved

Dear Ms. Kitchings:

Enclosed please find Appellant's Motion for Extension of Time to file the Initial Brief and Designation of Matters. Please also find the filing fee of

\$25.00.

If you have any added questions or concerns, I can be reached at 843.471-0174 or 443.469-4635.



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(843) 471-0174

Other Counsel of Record:

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✓

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REIDSVILLE NC 27320-7110

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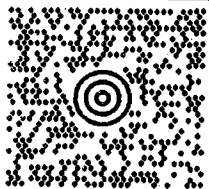
SC COURT OF APPEALS
1220 SENATE ST.

COLUMBIA SC 29201

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SC Court of Appeals

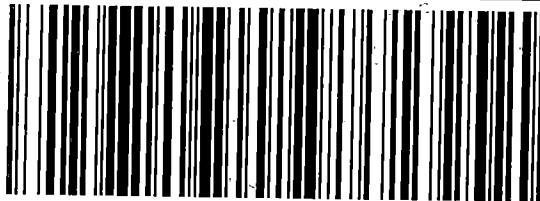


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