

We Are Columbia

Office of the City Attorney  
Post Office Box 667 • Columbia, SC 29202 • (803) 737-4242 • Fax (803) 737-4250

September 21, 2016

**VIA HAND DELIVERY**

The Honorable Daniel E. Shearouse  
Supreme Court Building  
1231 Gervais Street  
Columbia, South Carolina 29201

**RECEIVED**

SEP 21 2016

S.C. SUPREME COURT

RE: The City of Columbia v. Johnnie L. Clark and Harriet Clark  
Case No. 2016-000999

Dear Mr. Shearouse:

The Initial Brief of Respondent and Designation of Matter in the above-referenced case are due to be served and filed today, September 21, 2016. By this letter and the enclosed motion, I respectfully request an extension of thirty (30) days. This is the first extension request for the Initial Brief and Designation of Matter, and it is not intended for the purpose of delay. Counsel for Respondent has conferred with counsel for Appellant and opposing counsel does not object to this Motion for Extension of Time.

Sincerely,

Jessica R. Mangum  
Assistant City Attorney

JRM/jlh  
Enclosures as Stated

cc: Henry P. Wall, Esquire

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

**RECEIVED**

SEP 21 2016

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

S.C. SUPREME COURT

Hon. Dian Schafer Goodstein, Circuit Court Judge

Case No. 2016-000999

The City of Columbia.....Respondent,

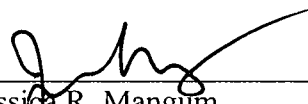
v.

Johnnie L. Clark and Harriet Clark.....Appellants.

MOTION FOR EXTENSION OF TIME

In connection with the above-referenced appeal, Respondent files this Motion for Extension of Time. Respondent requests an additional extension of thirty (30) days for the deadline to file the Initial Brief of the Respondent and Designation of Matter. The requested extension, if granted, would make Respondent's Initial Brief and Designation of Matter due on October 21, 2016. This is the first request by the Petitioner for an extension of the applicable time limitations in this matter. Counsel for Respondent has conferred with counsel for Appellant and opposing counsel does not object to this Motion for Extension of Time.

Respectfully submitted,

  
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Jessica R. Mangum  
Office of the City Attorney  
Post Office Box 667  
Columbia, South Carolina 29202  
(803) 733-8247  
Attorney for Respondent City of  
Columbia

September 21, 2016  
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Hon. Dian Schafer Goodstein, Circuit Court Judge

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Case No. 2016-000999

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The City of Columbia ..... Respondent,

v.

Johnnie L. Clark and Harriet Clark ..... Appellants.

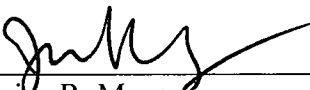
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**PROOF OF SERVICE**

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The undersigned hereby certifies that she served a copy of *Motion for Extension of Time* upon the Appellants by placing it in the United States mail, first class postage prepaid to their attorney of record at his address at 1735 St. Julian Place, Suite 200, Post Office Box 61110, Columbia, SC 29260 on this 21<sup>st</sup> day of September, 2016:

September 21, 2016

  
\_\_\_\_\_  
Jessica R. Mangum  
Office of the City Attorney  
Post Office Box 667  
Columbia, South Carolina 29202  
(803) 737-4242

Attorney for Respondent