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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SOUTH CAROLINA
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

Case No.: 2016-001178

Linda Estrada, George Estrada, Tyrone Ruff, Khalilah Smith,
Carletta Williams, and Cristian Reyes,.....Respondents,

Of whom Linda Estrada and George Estrada are the.....Respondents/Appellants,

v.

Andrew Marshall and Linda Marshall,.....Appellants/Respondents,

**MOTION FOR EXTENSION OF TIME TO FILE AND SERVE INITIAL
BRIEFS AND DESIGNATIONS OF MATTER TO BE INCLUDED IN THE
RECORD ON APPEAL/CROSS-APPEAL**

Pursuant to Rule 263(b), SCACR, counsel for the Appellants/Respondents, with the consent of counsel for the Respondents and Respondents/Appellants, hereby moves for a thirty (30) day extension of time in which to file and serve the Initial Briefs and Designations of Matter to be Included in the Record on Appeal. The grounds for this motion are set forth as follows:


- 1) This is the first request for an extension of this type by either party;
- 2) The current deadline for filing of the Initial Briefs and Designations of Matter is September 28, 2016;
- 3) The undersigned was preparing for oral arguments before the United States Court of Appeals for the Fourth Circuit that took place on September 22,

2016. The Record on Appeal was in excess of 4000 pages and preparing for arguments reduced the amount of time available to prepare the initial brief;

- 4) Appellants/Respondents and Respondents/Appellants would also request that the Initial Brief and Designation of Matter for the Cross-Appeal also be extended for the same amount of time.

WHEREFORE Appellants' counsel prays for an Order extending the time in which to file and serve the Initial Briefs and Designations of Matter to be Included in the Record on Appeal in this case until October 28, 2016.

RILEY, POPE & LANEY, LLC


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Counsel for the Appellants/Respondents

Columbia, South Carolina
September 27, 2016

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Carletta Williams, and Cristian Reyes,.....Respondents,

Of whom Linda Estrada and George Estrada are the.....Respondents/Appellants,

v.

Andrew Marshall and Linda Marshall,.....Appellants/Respondents,

CERTIFICATE OF SERVICE

This is to certify that I have this day caused to be served upon the person named below
the attached **Motion for Extension of Time to File Initial Briefs and Designations
of Matter to be Included in the Record on Appeal** in the above-captioned matter via

United States mail, first-class postage prepaid, to the following:


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Columbia, South Carolina
September 27, 2016

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September 27, 2016

HAND DELIVERED

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Linda Estrada, George Estrada, Tyrone Ruff, Khalilah Smith, Carletta Williams, and
Cristian Reyes v. Andrew Marshall and Linda Marshall
Case No.: 2016-001178
Our File No.: 5167.00614

Dear Ms. Kitchings:

Please find enclosed for an original and seven (7) copies of a Motion for Extension of Time to File Initial Briefs and Designations of Matter to be Included in the Record on Appeal along with an original and one (1) copy of proof of service. Please return one (1) filed copy of each to me with my courier. Also enclosed is my firm's check in the amount of \$25.00 to cover the filing fee. Please do not hesitate to contact me with questions.

If you have any questions, please let me know.

Sincerely,



Damon C. Wlodarczyk

DCW/

Enclosures

cc: John S. Nichols, Esquire (w/enclosures)
Gerald E. Reardon, Esquire (w/enclosures)
R. Nichols Riley, Jr., Esquire (w/enclosures)
Todd Ellis, Esquire (w/enclosures)

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