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OCT 04 2016

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS
THE HONORABLE D. CRAIG BROWN
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2016-001544
CIVIL ACTION NO. 2016-CP-40-02459

Sean Lyons,

APPELLANT,

versus

Palmetto Richland Springs,

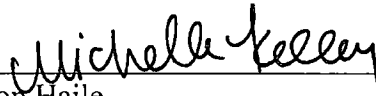
RESPONDENT.

MOTION FOR EXTENSION OF TIME

The Initial Brief of Respondent, Palmetto Richland Springs, and Designation of Matter to be Included in the Record on Appeal were originally due on Sunday, September 25, 2016. The Court granted a 30-day extension of time, until October 24, 2016, to serve and file the Respondent's Initial Brief and Designation of Matter. The Respondents respectfully request the Court grant an additional 30-day extension of time, until November 23, 2016, to serve and file the Respondent's Initial Brief and Designation of Matter.

This request is due to Respondent's counsel's workload, which includes a case pending in the South Carolina District Court, an additional appeal pending in the South Carolina Court of Appeals and numerous litigation matters pending in South Carolina circuit courts.

Accordingly, the Respondents respectfully request an extension of time until November 23, 2016, in which to serve and file their Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.



Shelton Haile
Michelle Kelley
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
ATTORNEYS FOR RESPONDENT

October 4, 2016.

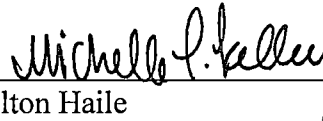
CERTIFICATE OF SERVICE

I, the undersigned, attorney for Palmetto Richland Springs, do hereby certify that I have this date served the foregoing First Motion for Extension of Time, dated October 4, 2016, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Sean Lyons
InTown Suites
8310 Two Notch Road, Room 208
Columbia, SC 29223

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Shelton Haile
Michelle P. Kelley
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Columbia, South Carolina 29202
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ATTORNEYS FOR RESPONDENT

Dated: October 4, 2016.

Reply To: Columbia
mkelley@richardsonplowden.com
Direct Dial: 803-576-3736

October 4, 2016

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: *Sean Lyons v. Palmetto Richland Springs*
Appellate Case No. 2016-001544
Civil Action No. 2016-CP-40-02459
RPR's File No. 4961-160

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of Respondent's First Motion for Extension of Time. Please file the Motion and return one filed-stamped copy with our runner.

We find it necessary to request this extension due to my workload, which includes pending matters in the South Carolina Court of Appeals, South Carolina District Court and South Carolina circuit courts. This is our second request for an extension of time to serve and file the Initial Respondents' Brief and Designation of Matter.

I am enclosing the \$25.00 filing fee and thank you for your consideration of this request. By copy of this letter, I am serving Plaintiff/Appellant with the same.

If the Court requires anything further or you have any questions, please do not hesitate to contact me.

Sincerely,


Michelle P. Kelley
SC Bar No. 75198

MPK:sjl
Enclosures

cc: Sean Lyons (Via U.S. Mail to InTown Suites, 8310 Two Notch Road, Room 208,
Columbia, SC 29223) (with enclosure)

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