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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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NOV 22 2016

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

DeAndrea Gist Benjamin, Circuit Court Judge

Appellate Case No.: 2016-000211

Kim Murphy Appellant

v.

Richland-Lexington School District No. 5 by and through its Board of Trustees by
And through Counsel to the Board of Trustees, Respondent.

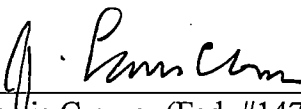
APPELLANT'S MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240 and 263(b) of the South Carolina Appellate Court Rules, the Appellant, Kim Murphy ("Appellant"), by and through her undersigned counsel hereby requests an order granting Appellant a 30-day extension of time to file and serve the Reply Brief. This request is being made because of scheduling conflicts, the Thanksgiving holiday, and my assumption of the primary role in drafting the reply due to the prior primary associate counsel for Ms. Murphy departing the firm this year. Furthermore, this is a complex case and may be a case of first impression as to whether an elected public official like Appellant can be removed in the middle of her term if the removal is not based on misconduct or job performance. A 30-day extension would allow Appellant's attorneys to have sufficient time to review Respondent's Brief and draft Appellant's Reply Brief.

Appellant's Reply Brief is currently due November 24, 2016. If the request is granted, Appellant's Reply Brief will be due December 24, 2016.

Opposing counsel is aware of Appellant's Motion for Extension of Time and has consented to the same.

J. LEWIS CROMER & ASSOCIATES, L.L.C.

By: 
J. Lewis Cromer (Fed. #1470)
Post Office Box 11675
Columbia, South Carolina 29211
(803) 799-9530
Attorney for Appellant

November 22, 2016

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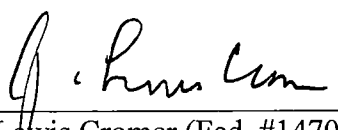
Kim Murphy Appellant
v.

Richland-Lexington School District No. 5 by and through its Board of Trustees by
And through Counsel to the Board of Trustees, Respondent.

PROOF OF SERVICE

I certify that I have caused service of the Appellant's Motion for Extension via United States Postal Service delivery, on November 22, 2016, to the attorney of record, John Reagle of Childs & Halligan, PA, at P.O. Box 11367, Columbia, SC 29211.

J. LEWIS CROMER & ASSOCIATES, L.L.C.

By: 
J. Lewis Cromer (Fed. #1470)
Post Office Box 11675
Columbia, South Carolina 29211
(803) 799-9530
Attorney for Appellant

**J. LEWIS CROMER
& ASSOCIATES L.L.C.**

ATTORNEYS AND COUNSELORS AT LAW

J. Lewis Cromer
Julius W. Babb, IV · J. Paul Porter
Ryan K. Hicks · Shannon M. Polvi

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SC Court of Appeals

November 22, 2016

Via Hand Delivery

Honorable Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
1220 Senate Street
Columbia, SC 29201

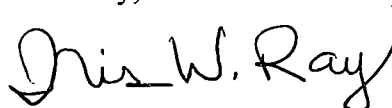
Re: *Murphy v Richland-Lexington School District 5 by and through its Broad of Trustees by and through Counsel to the Board of Trustees*
Appellate Case No. 2016-000211

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Appellant's Motion for Extension of Time on the above referenced matter. Also, enclosed are the original and one (1) copy of the Proof of Service, along with our firm's check in the amount of \$25.00. Please file the originals and return the clocked copies to our law clerk.

Should you have any questions and/or concerns, please feel free to call us. Thank you in advance for your assistance in this matter.

Sincerely,



Iris W. Ray
Litigation Paralegal

/iwr
Enclosures

cc: John Reagle, Esq.