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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

NOV 23 2016
SC Court of Appeals

Joseph M. Strickland, Master-in-Equity

Case No. 2016-001440

Carolina Chloride, Inc.,Appellant,

v.

South Carolina Department of Transportation,Respondent.

**FIRST MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT’S INITIAL REPLY BRIEF**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF
APPEALS:

Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules,
counsel for Appellant Carolina Chloride, Inc., LLC respectfully moves the
Court for an extension of time to file Appellant’s Initial Reply Brief. The
deadline for Appellant’s Initial Reply Brief is November 28, 2016. Counsel

respectfully requests a seven (7) day extension of time. Accordingly, the Initial Reply Brief would be due on December 5, 2016.

Counsel has contacted Respondent's counsel and he consents to this motion. Counsel asserts the extension is necessary due to the Thanksgiving holidays and counsel's current caseload and schedule. This is counsel's first motion for an extension of time to file the Initial Reply Brief.

Counsel appreciates the Court's attention and its accommodation regarding this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.



By:

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ATTORNEYS FOR APPELLANT

FIRST MOTION FOR EXTENSION OF
TIME TO FILE APPELLANT'S
INITIAL REPLY BRIEF

Columbia, South Carolina
November 22, 2016

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
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PROOF OF SERVICE

I hereby certify that I served Appellant's First Motion for Extension of Time to File Appellant's Initial Reply Brief upon all parties, by placing a copy in the United States mail, postage prepaid, to the below listed parties on November 22, 2016, addressed to the following:

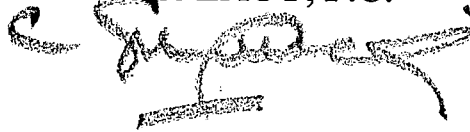
Beacham O. Brooker, Jr., Esquire
754 Kilbourne Road
Columbia, SC 29205

Counsel for Respondent

Edward D. Sullivan
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Co-counsel for Appellant

Respectfully submitted,

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ATTORNEYS FOR APPELLANT

PROOF OF SERVICE – FIRST
MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT’S INITIAL
REPLY BRIEF

Columbia, South Carolina
November 22, 2016



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

November 23, 2016

VIA HAND DELIVERY

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

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NOV 23 2016
SC Court of Appeals

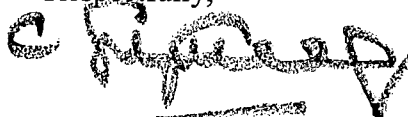
Re: Carolina Chloride, Inc. v. South Carolina Department of Transportation
Civil Action No. 2016-001440
C&L File No. 001114-00102

Dear Ms. Kitchings:

Please find enclosed the original and seven copies of Appellant's First Motion for Extension of Time to file its Initial Reply Brief in connection with the above referenced matter. Also enclosed is our firm's check in the amount of \$25.00, representing the filing fee of same. Please file the original and return a clocked copy to us via our courier.

By copy of this letter to counsel of record, we are serving same on him.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact us.

Respectfully,

Christian Stegmaier

CS/mmm
Enclosures
cc: Beacham O. Brooker, Jr., Esquire
Edward D Sullivan
Robert H. Morgan



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The Honorable Jenny A. Kitchings
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