

STATE OF SOUTH CAROLINA
In The Court of Appeals

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NOV 28 2016

APPEAL FROM SOUTH CAROLINA
Court of Common Pleas

SC Court of Appeals

Brian M. Gibbons, Circuit Court Judge

Case No. 2016-001178

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

v.

Andrew Marshall and Linda Marshall,.....Appellants,

**RESPONDENTS TYRONE RUFF, KHALILAH SMITH AND CARLETTA
WILLIAMS' MOTION FOR EXTENSION**

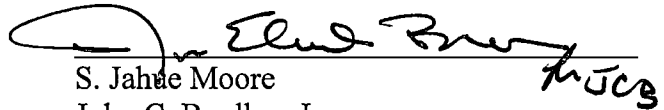
The undersigned, as counsel for the Respondents, above named (Tyrone Ruff, Khalilah Smith and Carletta Williams), hereby moves for a Thirty (30) day extension of time to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal. This motion is based on counsel's present work load. This extension request is not intended for purposes of delay, but rather to ensure that Respondents' Brief is properly researched and prepared. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculations the extension, if granted, would extend these Respondents deadline for filing their Initial Brief and Designation of Matter

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to be Included in the Record on Appeal to January 3, 2017. Counsel for Respondents has consulted with counsel for Appellant and the other Respondents and they do not oppose this request for an extension.

WHEREFORE, Respondents, above named, respectfully prays that this Court extend the deadline for the service and filing of the Initial Brief and Designation of Matter to be Included in the Record on Appeal to January 3, 2017.

MOORE TAYLOR LAW FIRM, PA

A handwritten signature in black ink, appearing to read "S. Jahne Moore". The signature is written over a horizontal line. To the right of the signature, there are handwritten initials "JSCB".

S. Jahne Moore
John C. Bradley, Jr.
1700 Sunset Boulevard (Hwy. 378)
Post Office Box 5709
West Columbia, South Carolina 29171
Telephone: (803) 796-9160
Facsimile: (803) 791-8410
Attorneys for Respondents Tyrone Ruff,
Khalilah Smith and Carletta Williams

November 28, 2016

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v.

Andrew Marshall and Linda Marshall,.....Appellants,

PROOF OF SERVICE

I certify that I have served Respondent's Motion for Extension of Time by U. S.

Mail on November 28, 2016, to the following counsel of record addressed as follows:

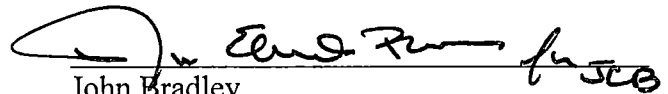
Damon C. Wlodarczyk, Esquire
P. O. Box 11412
Columbia, SC 29211

John S. Nichols, Esquire
P. O. Box 7965
Columbia, SC 29202

Gerald E. Reardon, Esquire
1329 Blanding Street
Columbia, SC 29201

Todd Ellis, Esquire
7911 Broad River Road, Suite 100
Irmo, SC 29063

MOORE TAYLOR LAW FIRM, P.A.



John Bradley
1700 Sunset Boulevard (Hwy. 378)
Post Office Box 5709
West Columbia, South Carolina 29171
Telephone: (803) 796-9160
Facsimile: (803) 791-8410
Attorney for Respondents Tyrone Ruff,
Khalilah Smith and Carletta Williams



November 30, 2016

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter 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

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SC Court of Appeals

S. Jahue Moore†
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley†
Sheila McNair Robinson
Christian G. Spradley
C. David Sawyer, Jr.
William H. Edwards
Stanley L. Myers
Jane H. Downey♦
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Sarah Taylor Cassidy

Robert D. Hazel
OF COUNSEL
Billy C. Coleman
RETIRED

Dear Ms. Kitchings:

You will please find enclosed the original and ten (10) copies of Respondents Tyrone Ruff Khalilah Smith and Carletta Williams' Motion for Extension of Time to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal. Also enclosed is our check in the amount of \$25.00 for the filing fee. I would appreciate your filing the original in your office and return the filed copies to me via my courier. Under cover of this letter, I am serving opposing counsel with a copy of this motion.

Thank you for your assistance in this matter.

With kindest regards, I am,

Yours very truly,

John C. Bradley, Jr.

/gmn

Enclosures

cc: Damon C. Wlodarczyk, Esquire (w/enclosures)
John S. Nichols, Esquire (w/enclosures)
Gerald E. Reardon, Esquire (w/enclosures)
Todd Ellis, Esquire (w/enclosures)

1700 Sunset Boulevard, West Columbia SC 29169 | PO Box 5709, West Columbia SC 29171

TEL 803.796.9160 FAX 803.791.8410 www.mooretaylorlaw.com