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STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

RECEIVED

JAN 03 2017

SC Court of Appeals

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 the Holiday schedule (conflicts and office closure) as well as counsel's work load prior to the end of the year. 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

to be Included in the Record on Appeal to February 3, 2017.

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 February 3, 2017.

MOORE TAYLOR LAW FIRM, PA



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Attorneys for Respondents Tyrone Ruff,
Khalilah Smith and Carletta Williams

January 3, 2017

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PROOF OF SERVICE

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

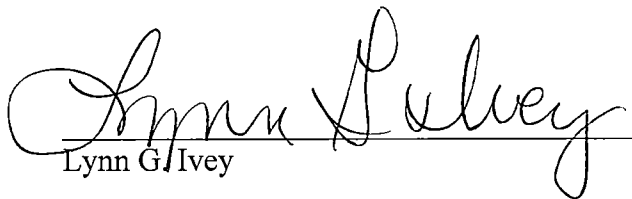
Mail on January 3, 2017, to the following counsel of record addressed as follows:

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P. O. Box 11412
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7911 Broad River Road, Suite 100
Irmo, SC 29063


Lynn G. Ivey

West Columbia, South Carolina
January 3, 2017

January 3, 2017

VIA HAND DELIVERY

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

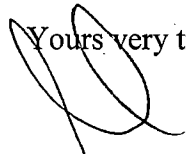
Dear Ms. Kitchings:

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 returning the filed copies to me via my courier. Under cover of this letter, I am serving opposing counsel with a copy of this motion. I realize that this is our second such request. While I have been working on this matter, a very heavy December workload coupled with the Holiday schedule has necessitated me respectfully requesting a second extension.

Thank you for your assistance in this matter.

With kindest regards, I am,

Yours very truly,


John C. Bradley, Jr.

/lgi

Enclosures

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