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JAN 17 2017  
SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable J.C. Nicholson, Jr.

Appellate Case No. 2016-002209

Steven Newbern and Claudia Newbern,..... Appellants,

v.

Ford Motor Company,.....Respondent.

CONSENT MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS' INITIAL BRIEF  
AND DESIGNATION OF MATTER

Appellants Steven Newbern and Claudia Newbern ("Appellants") move this Court for a thirty-day extension in which to file the Initial Brief of Appellants and Designation of Matter to be included in the Record on Appeal. The Initial Brief of Appellants is currently due on January 18, 2017. This is Appellants' first request for an extension. Appellants respectfully request an extension of thirty days, making the Initial Brief of Appellants and Designation of Matter due on February 17, 2017. The undersigned contacted opposing counsel, and they do not object to this request.

*[Signature block appears on the following page.]*



January 13, 2017

Respectfully submitted,

*Kathleen C. Barnes*

Kathleen Chewning Barnes, SC Bar No. 78854

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*Attorneys for Appellants*

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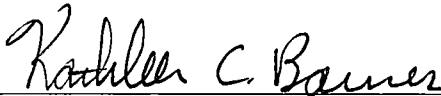
PROOF OF SERVICE

The undersigned certifies that a copy of the *Consent Motion for Extension of Time to File Appellants' Initial Brief and Designation of Matter* has been served upon the counsel of record listed below by mailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown below this 13 day of January, 2017.

TURNER, PADGET, GRAHAM & LANEY, P.A.  
Kenneth Carter  
Carmelo B. Sammataro  
P.O. Box 1473  
Columbia, SC 29202

BOWMAN AND BROOKE  
Robert L. Wise  
901 East Byrd Street, Suite 1650  
Richmond, VA 23219

January 13, 2017

  
Kathleen Chewning Barnes  
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# BARNES

LAW FIRM | LLC

Kathleen C. Barnes  
Admitted: Georgia | South Carolina

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January 13, 2017

**Via U.S. Mail**

The Honorable Jenny Abbott Kitchings  
Clerk of Court for the Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

Re: *Steven Newbern and Claudia Newbern v. Ford Motor Company*,  
Appellate Case No. 2016-002209

Dear Mrs. Kitchings:

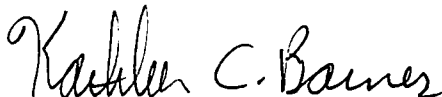
Enclosed for filing please find the original and seven copies of Appellants' Consent Motion for Extension of Time to File Appellants' Initial Brief and Designation of Matter. Also enclosed is proof of service of the Motion, and a check in the amount of \$25.00 for the Motion filing fee.

Please file the documents and return one file-stamped copy to me in the enclosed self-addressed, stamped envelope. By copy of this letter, I am serving all counsel of record with a copy of the same.

If you have any questions, please do not hesitate to contact me. Thank you.

With kind regards, I am,

BARNES LAW FIRM, LLC



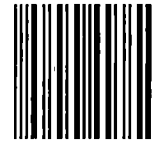
Kathleen C. Barnes

cc: Kenneth Carter  
Carmelo B. Sammataro  
Robert L. Wise  
Stephen E. Van Gaasbeck (via email)  
Raymond O. Bodiford (via email)  
William Applegate

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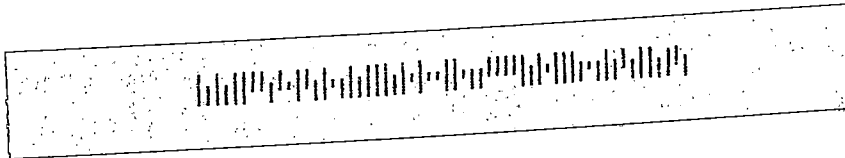


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The Honorable Jenny Abbott Kitchings  
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