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IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

RECEIVED

JAN 23 2017

SC Court of Appeals

Case No. 2015-CP-26-8179
Appellate Case No. 2016-002175

Robert DeCiero, a resident of Long Bay Estates Subdivision,
Myrtle Beach, South CarolinaAppellant,

v.

Horry County, State of South Carolina.....Respondent.

APPELLANT'S MOTION FOR
EXTENSION OF TIME

Pursuant to the South Carolina Appellate Court Rules, Appellant, by and through his undersigned counsel, hereby moves the Court for an Order granting Appellant an additional 30-day extension of time, until February 24, 2017, in which to file Appellant's Initial Brief and Designation of Matter. Appellant would submit that this extension is necessary due to the fact

counsel is currently traveling and will be out of town until February 9, 2017. This extension will allow counsel the additional time necessary to be devoted to preparing these documents.

Appellant would further submit that no prejudice will inure to the Respondent by the granting of this Motion.

THE BRITAIN LAW FIRM



Thomas C. Brittain (SC Bar #00893)
4614 Oleander Drive
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(843) 449-8562
tommyb@brittainlawfirm.com
marymadison@brittainlawfirm.com
Attorneys for the Appellants

January 20, 2016
Myrtle Beach, SC

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PROOF OF SERVICE

I, Allison Lazar, do hereby certify that I am an employee of THE BRITAIN LAW FIRM, P.A., attorneys for the Appellant in the above-entitled action, and that I have this 20th day of January 2017, caused to be served upon the following parties the **Motion for Extension of Time** by depositing a copy of same in the United States Mail, with sufficient first class postage affixed thereto, addressed as follows:

Elise F. Crosby, Esquire
Crosby Law Firm, LLC
405 Dozier Street
Georgetown, SC 29440

Allison Lazar
Allison Lazar

SWORN AND SUBSCRIBED before me
this 20th day of January, 2017.

Alma Jenkins
NOTARY PUBLIC FOR SOUTH CAROLINA
My Commission Expires: 5/2/2017

THE BRITTAIN LAW FIRM, P.A.

ATTORNEYS AT LAW
4614 OLEANDER DRIVE
MYRTLE BEACH, SOUTH CAROLINA 29577

THOMAS C. BRITTAIN
MARY MADISON BRITTAIN LANGWAY
A. PRESTON BRITTAIN
T. CASE BRITTAIN, JR.

843-449-8562
FAX 843-497-6124
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January 20, 2017

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Robert DeCiero, a resident of Long Bay Estates Subdivision, Myrtle Beach, South Carolina v. Horry County, State of South Carolina
Appellate Case No: 2016-002175

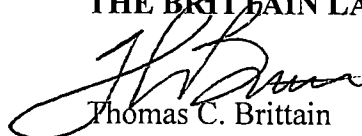
Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the second Motion for Extension of Time to file and serve Appellant's Initial Brief and Designation of Matter together with the Proof of Service and filing fee of \$25.00.

Please return one clocked-in copy of the Motion and Proof of Service to our office in the enclosed self-addressed stamped envelope.

With warm regards, I am
Yours truly,

THE BRITTAIN LAW FIRM, P.A.


Thomas C. Brittain
TCB/all

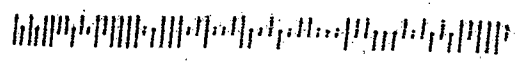
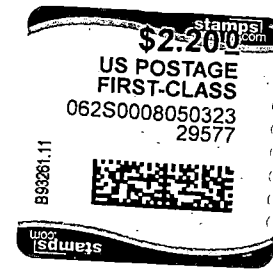
cc: Elise F. Crosby, Esquire

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J



THE BRITAIN LAW FIRM, P.A.
ATTORNEYS AT LAW
4614 OLEANDER DRIVE
MYRTLE BEACH, SOUTH CAROLINA 29577

TO:

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