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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

S. Jackson Kimball, Master in Equity for York County

Appellate Case No. 2016-000451

**RECEIVED**

William G. Tucker,

Respondent,

JAN 30 2017

**SC Court of Appeals**

v.

Connie Lynn Batey,

Appellant.

MOTION FOR EXTENSION OF TIME  
OR TO FILE OUTSIDE TIME


Pursuant to Rules 240 and 263(b), S.C.A.C.R., the Appellant, by her counsel herein, moves this Court for an order granting her an extension of time, or the right to file outside time, as to her Initial Brief and Designation of Matter to be included in the Record on Appeal, on the grounds stated below:

1. The Appellant's Initial Brief and Designation of Matter to be included in the Record on Appeal are, after extensions, due as of January 27<sup>th</sup>, 2017.
2. Because of the press of business in the office of the Appellant's attorney, including other Appellate deadlines, Court hearings and seasonal shutdowns, counsel for Appellant has been unable to supply those pleadings timely to this Court.
3. To this end, counsel for Appellant requests an extension of time for a period of twenty (20) days.

The basis of this Motion is the within-cited Rules, the records of this appeal, and any attached affidavit or stipulation of the undersigned, which items are hereby incorporated in this Motion.

WHEREFORE, the Appellant herein moves this Court to be allowed for an extension of time to file her Initial Brief and Designation of Matter to be included in the Record, as set out above, pursuant to Rule 240 and 263(b), S.C.A.C.R.

January 28, 2017

  
\_\_\_\_\_  
John Martin Foster  
Post Office Box 106  
Rock Hill, South Carolina 29731  
803 324-8100  
Attorney for Appellant

Other Counsel of Record:

cc: Brian S. McCoy  
McCoy Law Firm, LLC  
378 East Main Street  
Rock Hill, S.C. 29730  
Attorney for Respondent  
(803) 366-2280

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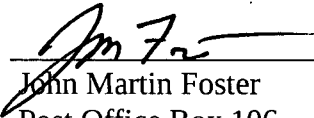
PROOF OF SERVICE

I certify that I have served the Motion for Extension dated January 28, 2017, on the following counsel or persons of record:

Brian S. McCoy  
McCoy Law Firm, LLC  
378 East Main Street  
Rock Hill, S.C. 29730  
Attorney for Respondent

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out above, pursuant to Rule 262, S.C.A.C.R.

January 28, 2017

  
\_\_\_\_\_  
John Martin Foster  
Post Office Box 106  
Rock Hill, S. C. 29731-6106  
803 324-8100  
Attorney for Appellant

JOHN MARTIN FOSTER

*Attorney at law*

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The Guardian Building	PO Box 106	803 324 8100
223 East Main Street Suite 520	Rock Hill SC	803 324 8109 Fax
Rock Hill South Carolina 29730	29731-6106	jmfoster@comporium.net

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January 28, 2017

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

Re: William G. Tucker, Respondent,  
v. Connie Lynn Batey, Appellant.

Appellate Case No. 2016-000451

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JAN 30 2017

SC Court of Appeals

Dear Ms. Kitchings:

In accordance with Rules 240 and 263(a), S.C.A.C.R., enclosed herewith please find the original and seven (7) copies of the Appellant's Motion for Extension, together with the Certificate of Service for the same in the above referenced case. I also enclose our check for the Motion fee of \$25.00.

By copy of this letter, I am serving the attorney for the Respondent with copies of the said Motion, as evidenced by the Certificate of Service.

Please return the extra conformed copy to my office in the enclosed self-addressed, stamped envelope. As always, thank you, and your staff, for your assistance in these matters.

Sincerely yours,

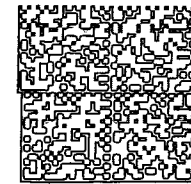


John Martin Foster


jmf/  
enclosures

cc: Client File

Brian S. McCoy  
McCoy Law Firm, LLC  
378 East Main Street  
Rock Hill, S.C. 29730  
Attorneys for Respondent  
(803) 366-2280



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Mailed From 29730



**John Martin Foster Attorney**  
223 East Main St Suite 520  
Post Office Box 106  
Rock Hill SC 29731-6106

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**TO:**

THE HONORABLE JENNY ABBOTT KITCHINGS  
CLERK OF THE COURT OF APPEALS  
POST OFFICE BOX 11629  
COLUMBIA, S.C. 29211

**RECEIVED**

JAN 30 2017

SC Court of Appeals

