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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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MAR 06 2017

APPEAL FROM YORK COUNTY  
Court of Common Pleas

**SC Court of Appeals**

D. Garrison Hill, Circuit Court Judge  
S. Jackson Kimball, Special Circuit Court Judge

Appellate Case No. 2016-002118

Lucille H. Ray . . . . . Appellant,

v.

City of Rock Hill, South Carolina,  
a Municipal Corporation, and  
South Carolina Department of Transportation,  
an agency of the State of South Carolina,

Of which City of Rock Hill is . . . . . Respondent.

**MOTION FOR EXTENSION**

COMES NOW respondent the City of Rock Hill ("Respondent") through its undersigned counsel and pursuant to Rules 240 and 263(b), SCACR, and respectfully requests an extension of time to serve and file the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal ("Respondent's Brief and Designation").

Appellant served Appellant's Initial Brief and Appellant's Designation of Matter to be Included in the Record



on Appeal (collectively, "Appellant's Brief and Designation") on February 10, 2017. The deadline for the City to serve Respondent's Brief and Designation is March 13, 2017.

The City respectfully requests the Court grant the City a thirty-day extension, or until April 12, 2017, to file and serve Respondents' Brief and Designation. City submits this Request to afford the City and its counsel sufficient time to review the issues in Appellant's Brief, review the record, and prepare a proper response in this appeal.

**WHEREFORE,** the undersigned counsel for the City respectfully requests a thirty-day extension of time in which to serve and file the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

March 3, 2017

By: 

Jeremy D. Melville  
SC Bar No. 77473  
W. Mark White  
SC Bar No. 7016  
SPENCER & SPENCER, P.A.  
226 East Main Street  
P.O. Box 790  
Rock Hill, SC 29731  
Phone: (803)327-7191  
Fax: (803) 327-3868

ATTORNEYS FOR RESPONDENT  
CITY OF ROCK HILL

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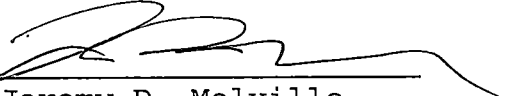
**PROOF OF SERVICE**

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I certify that I have served the foregoing Motion for Extension of Time by depositing a copy in the United States Mail, postage prepaid, on March 3, 2017, addressed to council of record for Appellant as follows:

Richard B. Fennell  
James, McElroy & Diehl, P.A.  
600 College Street  
Charlotte, NC 28202

SPENCER & SPENCER, P.A.

By: 

Jeremy D. Melville  
226 East Main Street  
P.O. Box 790  
Rock Hill, SC 29731  
Tel: (803)327-7191  
Fax: (803)327-3868

ATTORNEY FOR RESPONDENT  
CITY OF ROCK HILL

**SPENCER & SPENCER**  
PROFESSIONAL ASSOCIATION

*Attorneys and Counselors at Law*

C.E. SPENCER (1849-1921)  
C.W.F. SPENCER (1876-1956)  
C.W.F. SPENCER, JR. (1911-1985)  
EMIL W. WALD (1934-2011)  
W.C. SPENCER †  
WILLIAM L. "RED" FERGUSON †  
PAUL W. DILLINGHAM  
W. MARK WHITE\*  
W. CHAPLIN SPENCER, JR.\*  
R. ALEXANDER SULLIVAN\*  
R. BRENT THOMPkins\*  
JEREMY D. MELVILLE\*

† Of Counsel

\* Also admitted in NC

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**SC Court of Appeals**

March 3, 2017

SUITE 200  
226 EAST MAIN STREET  
P.O. BOX 790  
ROCK HILL, S.C. 29731-6790

Telephone  
803-327-7191

Telecopier  
803-327-3868

E-Mail Address  
jeremymelville@spencerfirm.com

Website  
www.spencerfirm.com

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

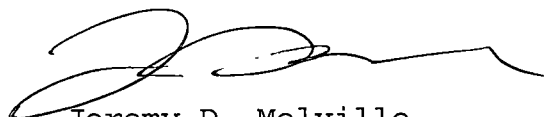
Re: Lucille H. Ray v. City of Rock Hill, et al.  
Appellate Case No. 2016-002118

Dear Ms. Kitchings:

Enclosed please find a Motion for Extension of Time and Proof of Service in the matter referenced above, along with seven copies of the Motion. Also enclosed is a \$25.00 check for the motion fee. Please file these documents with the records of the Court and return clocked copies to me in the enclosed envelope. Please call if you need anything further.

Sincerely,

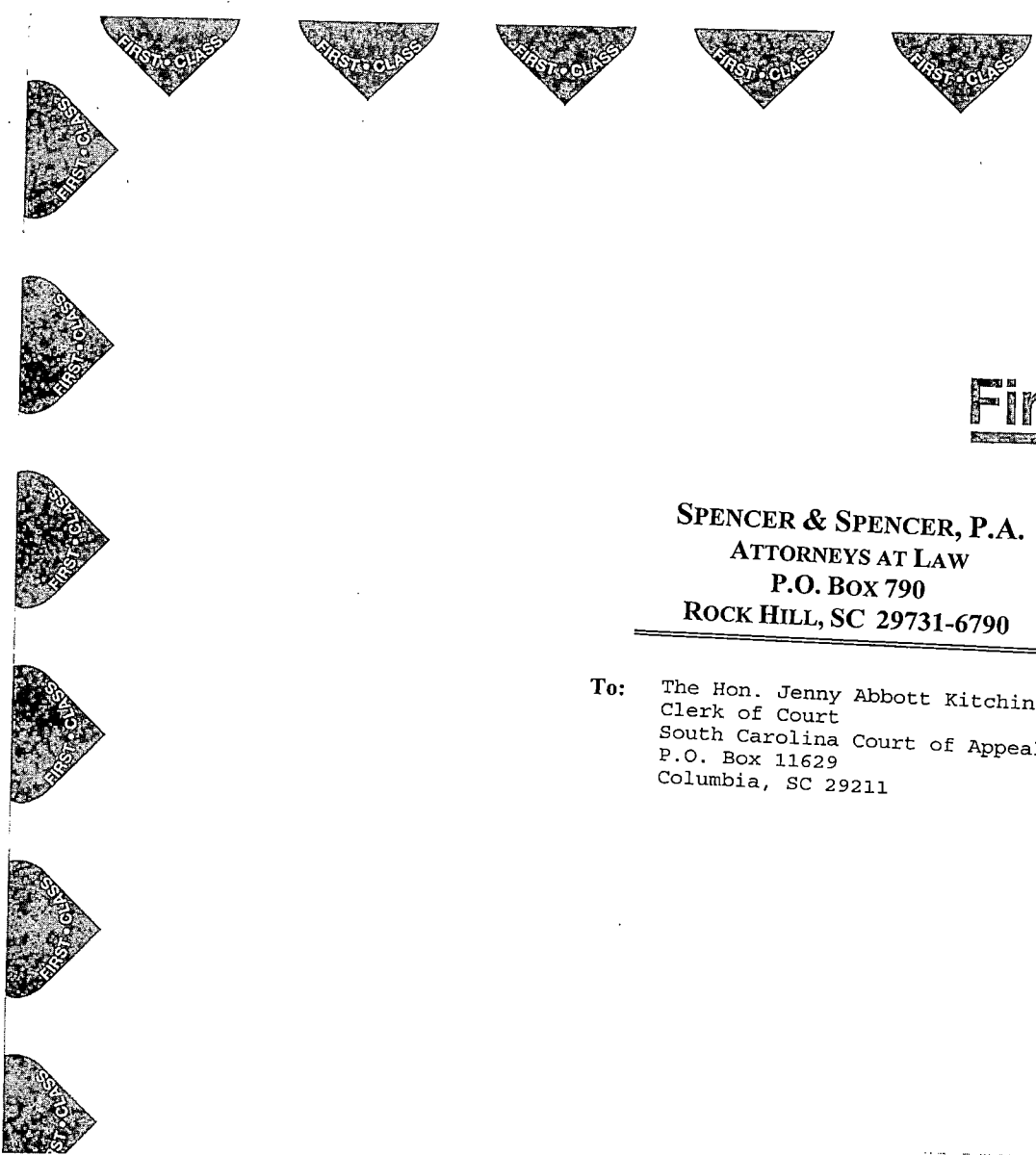
SPENCER & SPENCER, P.A.




Jeremy D. Melville

Enclosures

cc: Richard B. Fennell, Esq.



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**SPENCER & SPENCER, P.A.**  
ATTORNEYS AT LAW  
P.O. Box 790  
ROCK HILL, SC 29731-6790

To: The Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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