

# McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC) S.  
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John G. Felder, Jr.  
W. Jones Andrews, Jr.  
Jordan C. Calloway  
Susan F. Campbell  
Deborah Casey (NC)\*  
Ashley White Creech  
Shawn B. Deery  
Chance Farr (NC)



Whitney B. Harrison  
Lara Pettiss Harrill  
Patrick M. Killen  
William A. McKinnon (SC,DC)  
Anna S. Magann  
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Joseph G. Wright, III\*  
Of Counsel\*

writers email: [wharrison@mcgowanhood.com](mailto:wharrison@mcgowanhood.com)

February 1, 2017

**RECEIVED**

FEB 01 2017

**SC Court of Appeals**

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

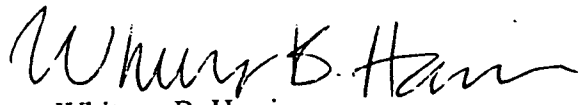
RE: *Travis Roddey, individually and as the Personal Representative of the Estate of Alice Monique Beckham Hancock, deceased v. Wal-Mart Stores East, L.P.; U.S. Security Associates, Inc., and Derrick L. Jones*  
Appellate Case No. 2016-002248

Dear Ms. Kitchings,

I am writing to seek a thirty (30) day extension of time to file an Initial Brief. The current deadline is February 16, 2017. If granted, the new deadline for the Initial Brief would be March 18, 2017. I ask that all filing deadlines be held in abeyance pending a decision on this request for an extension.

Enclosed please find the original and seven (7) copies of Appellant's Motion for Extension. Please return a clocked copy of the Motion. I am also enclosing a check from our firm in the amount of \$25.00 to cover the filing fee for this motion. If you have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am

  
Whitney B. Harrison

Enclosures

cc: Howard Boyd, Esquire  
Stephanie Flynn, Esquire

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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FEB 01 2017

SC Court of Appeals

APPEAL FROM LANCASTER COUNTY  
Court of Common Pleas

G. Thomas Cooper, Circuit Court Judge

Appellate Case No. 2016-002248

Travis Roddey, individually and as the Personal Representative of the Estate of Alice  
Monique Beckham Hancock, Deceased. .... Appellant,


v.

Wal-Mart Stores East, L.P., U.S. Security Associates, Inc., and Derrick L. Jones  
..... Respondents,

**MOTION FOR EXTENSION**

Appellant respectfully requests a thirty (30) day extension of time to file her Initial Brief in this matter due to previously scheduled matters including a medical procedure that had her out of the office for a week in January. The current deadline is February 16, 2017. If granted, the new deadline for the Initial Brief would be March 18, 2017.

Respectfully submitted,



February 1, 2017  
Columbia, SC

Whitney B. Harrison  
McGowan, Hood & Felder, LLC  
1517 Hampton Street  
Columbia, SC 29201  
(803) 779-0100  
[wharrison@mcgowanhood.com](mailto:wharrison@mcgowanhood.com)  
ATTORNEY FOR APPELLANT

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LANCASTER COUNTY  
Court of Common Pleas

G. Thomas Cooper, Circuit Court Judge

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**SC Court of Appeals**

Travis Roddey, individually and as the Personal Representative of the Estate of Alice Monique Beckham Hancock, Deceased. ....Appellant,

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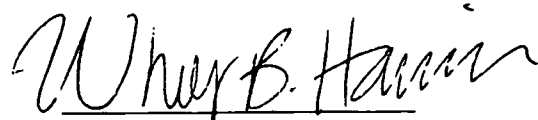
**PROOF OF SERVICE**

The undersigned hereby certifies that on February 1, 2017, she served counsel for Respondent with the *Motion for Extension* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

Stephanie Flynn & Howard Boyd  
P.O. Box 10589  
Greenville, SC 29603

*Signature Page to Follow*

Respectfully submitted,

A handwritten signature in black ink that reads "Whitney B. Harrison". The signature is written in a cursive style with a horizontal line underneath the name.

Whitney B. Harrison  
McGowan, Hood & Felder, LLC  
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Columbia, SC 29201  
(803) 779-0100  
(803) 7878-0750 (fax)  
[wharrison@mcgowanhood.com](mailto:wharrison@mcgowanhood.com)  
ATTORNEY FOR APPELLANT

February 1, 2017  
Columbia, SC