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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

MAR 10 2017

SC Court of Appeals

The Honorable John C. Hayes, III

Case No. 15-CP-46-1827  
Appellate Case No. 2016-001558

McGowan, Hood & Felder, LLC and Chad McGowan,..... Respondents-Appellants,

v.

Willie Bell, individually and on behalf of the Estate of Emma M. Davis as its duly appointed Personal Representative, ..... Appellant-Respondent.

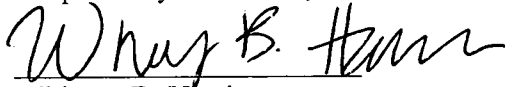
**MOTION FOR EXTENSION**

Respondents-Appellants respectfully request a thirty (30) day extension of time to file their Initial Brief in this matter due to previously scheduled matters, including travel to New York City the week of February 13, 2017, cross-motions for summary judgment in a case pending before the United States District Court for the District of South Carolina, a post-trial evidentiary hearing, and a brief in the Court of Appeals for the Sixth Circuit, as well as unscheduled matters involving the death in the family of one of the attorneys for Respondents-Appellants. The current deadline is March 13, 2017. If granted, the new deadline for the Initial Brief would be April 12, 2017.

*Signature Page to Follow*

March 10, 2017  
Columbia, SC

Respectfully submitted,



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ATTORNEYS FOR RESPONDENTS-  
APPELLANTS MCGOWAN, HOOD, AND  
FELDER, LLC AND CHAD MCGOWAN

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v.

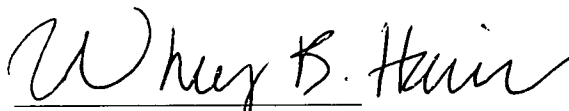
Willie Bell, individually and on behalf of the Estate of Emma M. Davis as its duly appointed Personal Representative, ..... Appellant-Respondent.

**PROOF OF SERVICE**

The undersigned hereby certifies that on March 10, 2017, she served counsel for Appellant-Respondent with the *Motion for Extension and Notice of Appearance* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

A. Camden Lewis  
Ariail E. King  
LEWIS BABCOCK LLP  
Post Office Box 11208  
Columbia, SC 29211

Respectfully submitted,



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ATTORNEYS FOR RESPONDENTS-  
APPELLANTS

March 10, 2017  
Columbia, SC

# McGowan, Hood & Felder, LLC

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



Eve S. Goodstein  
Lara Pettiss Harrill  
Whitney B. Harrison  
Patrick M. Killen  
Anna S. Magann  
Robert V. Phillips  
James. L. Ward, Jr. (SC, NC)  
James Stephen Welch\* (SC,OK)  
Joseph G. Wright, III\*  
Of Counsel\*

March 10, 2017

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

RECEIVED

MAR 10 2017

SC Court of Appeals

Re: *McGowan, Hood & Felder, LLC and Chad McGowan v. Willie Bell, individually and on behalf of the Estate of Emma M. Davis as its duly appointed Personal Representative*  
Appellate Case No. 2016-001558

Dear Ms. Kitchings:

We are writing to seek a thirty (30) day extension of time to file an Initial Brief and to note my appearance in this matter. The current deadline is March 13, 2017. If granted, the new deadline for the Initial Brief would be April 12, 2017. We 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.

Very truly yours,

A handwritten signature in black ink that reads 'Whitney B. Harrison'. The signature is written in a cursive, flowing style.

Whitney B. Harrison

Enclosures

cc: A. Camden Lewis  
Ariail E. King