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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAR 09 2017

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2014-CP-40-5563
Appellate Case No. 2016-002168

Renee Hale Shelley, as Personal Representative
of the Estate of Michael Mann Lindler Appellant/Respondent,

v.

South Carolina Highway Patrol Respondent/Appellant.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Appellant/Respondent requests a 20-day extension of the deadline for filing her initial brief of appellant and designation of matter to be included in the record on appeal. The current deadline is March 13, 2017. This is the third request for an extension of this deadline.

This Court's prior order instructed no further extensions would be granted absent as extraordinary circumstances. This will be the final extension request. Attorney Blake Hewitt has chief responsibility for preparing the appellant's brief and was out of the office for 3 continuous weeks in January. Since returning to the office he has briefed a case with an extensive record—a 2,000 page transcript—and the transcript in this case is also lengthy. Despite his best efforts, counsel not had the opportunity to complete two briefs in two sizable cases in a 4 week time. This brief will, however, be completed within this extension.

March 9, 2017

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John S. Nichols", written over a horizontal line.

Blake A. Hewitt # 73674

John S. Nichols #4210

BLUESTEIN NICHOLS

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Attorneys for Appellant/Respondent

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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served
counsel for the Respondent/Appellant with a copy of the *Motion for Extension* by mailing
copies of the same by United States Mail with first class postage prepaid to the following
address:

Andrew F. Lindemann
Joel S. Hughes
Davidson & Lindemann, PA
PO Box 8568
Columbia, SC 29202-8568



Erin Bridges

March 9, 2017



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

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SC Court of Appeals

VIA HAND DELIVERY

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

Re: Renee Hale Shelley v. SC Highway Patrol
Case Tracking No.: 2016-002168

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in this case. I have also enclosed a proof of service on counsel of record and our firm check in the amount of \$25.00 for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges
Paralegal to Blake A. Hewitt
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Lauren V. Knight, Esquire
Joel S. Hughes, Esquire
Andrew F. Lindemann, Esquire