

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Case No. 2013-CP-23-06522

RECEIVED

MAR 29 2017

SC Court of Appeals

Madel C. Rivero, as Personal Representative
for the Estate of Lilia Lorena Blandin, Respondent,

v.

Sheriff Steve Loftis, in his capacity as
Sheriff of Greenville County Appellant.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, respondent requests a 30-day extension of the deadline for filing his initial brief and designation of matter to be included in the record on appeal. The current deadline is March 29, 2017. This is the fourth request for an extension of this deadline.

Respondent's counsel posits the following extraordinary circumstances supporting this request:

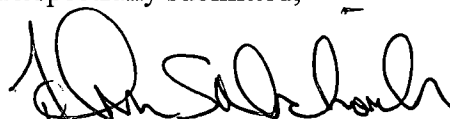
- A. Counsel continues to deal with family medical emergencies in Florence, South Carolina, which has necessitate counsel's presence;
- B. Counsel is on the Board of Law Examiners and has been undergoing grading the Uniform Bar Exam, which was administered for the first time in South Carolina on

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February 21-22, 2017;

- C. Counsel is engaged as special counsel to the South Carolina House Ethics Committee and has been engaged in assisting with unexpected queries from members and in-house counsel and assisting the Committee with screening candidates for the newly constituted South Carolina State Ethics Commission.
- D. Counsel is lead counsel on the case of *Richland County v. SCDOR*, which the Supreme Court certified from this Court on March 21 and ordered expedited briefing. This caused counsel to shift work load attention.
- E. Counsel advised counsel for Appellant who does not object to this request.

Respectfully submitted,



John S. Nichols, # 4210
Bluestein, Nichols,
Thompson & Delgado, LLC
Post Office Box 7965
Columbia, South Carolina 29202
(803) 779-7599

March 29, 2017

Attorney for Respondent

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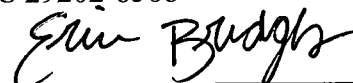
Sheriff Steve Loftis, in his capacity as
Sheriff of Greenville County Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served
counsel for the 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
addresses:

Russell W. Harter, Jr.
Carly H. Davis
Chapman, Harter & Harter, P.A.
PO Box 10224
Greenville, SC 29603

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



Erin Bridges

March 29, 2017



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

March 29, 2017

VIA HAND DELIVERY

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

RECEIVED

MAR 29 2017

SC Court of Appeals

Re: Madel Rivero v. Sheriff Steve Loftis
Case Tracking No. 2016-000548

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to the above matter. I have also enclosed a proof of service of this document on counsel for the Appellant and a \$25.00 check 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 John S. Nichols
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Daniel W. Luginbill, Esquire
J. Christopher Wilson, Esquire
Russell W. Harter, Jr., Esquire
Carly H. Davis, Esquire
Andrew F. Lindemann, Esquire