

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

The Honorable John C. Hayes, III

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

**RECEIVED**

APR 04 2017

SC Court of Appeals

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.

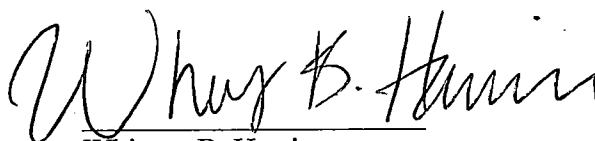
**MOTION FOR EXTENSION**

Respondents-Appellants respectfully request a thirty (30) day extension of time to file their Respondents' Initial Brief in this matter. Respondents-Appellants are considering dismissing their cross-appeal, which would streamline the issues and briefs before the Court. Additional time is also requested due to previously scheduled matters for lead counsel including preparation for a trial that was scheduled for March 16, 2017 and travel to Nashville, Tennessee the week of March 27, 2017 for business meetings. The current deadline is April 9, 2017. If granted, the new deadline for the Respondents' Initial Brief would be May 9, 2017.

*Signature Page to Follow*

April 4, 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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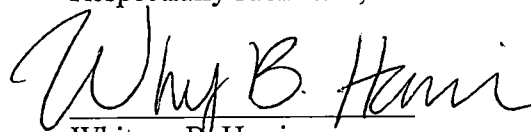
Willie Bell, individually and on behalf of the Estate of Emma M. Davis as its duly appointed Personal Representative, ..... Appellant-Respondent.

**PROOF OF SERVICE**

The undersigned hereby certifies that on April 4, 2017, she served counsel for Appellant-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:

A. Camden Lewis  
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Respectfully submitted,



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April 4, 2017  
Columbia, SC

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April 4, 2017

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

**RECEIVED**

APR 04 2017

**SC Court of Appeals**


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

Dear Ms. Kitchings:

I am writing to seek a thirty (30) day extension of time to file the Respondents' Initial Brief. The current deadline is April 9, 2017. If granted, the new deadline for the Respondents' Initial Brief would be May 9, 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 Respondents' Motion for Extension. Please return a clocked copy of the Motion. I am also enclosing a check from 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: A. Camden Lewis  
Ariail E. King