

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

D. Garrison Hill, Circuit Court Judge
S. Jackson Kimball, Special Circuit Court Judge APR 10 2017

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SC Court of Appeals

Appellate Case No. 2016-002118

Lucille H. Ray Appellant,

v.

City of Rock Hill, South Carolina,
a Municipal Corporation, and
South Carolina Department of Transportation,
an agency of the State of South Carolina,

Of which City of Rock Hill is Respondent.

MOTION FOR EXTENSION

COMES NOW respondent the City of Rock Hill ("Respondent") through its undersigned counsel and pursuant to Rules 240 and 263(b), SCACR, and respectfully requests an extension of time to serve and file the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal ("Respondent's Brief and Designation").

The current deadline for Respondent to file and serve Respondent's Brief and Designation in this matter is April 12,

2017. Respondent respectfully requests a thirty-day extension, or until May 12, 2017, to file and serve Respondent's Brief and Designation. Respondent submits this Request on account of a heavy workload and competing deadlines and to afford the undersigned additional time needed to properly prepare Respondent's Brief and Designation in this matter. This is Respondent's second request for an extension of time in this matter.

WHEREFORE, the undersigned counsel for Respondent respectfully requests a thirty-day extension of time in which to serve and file the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

April 3, 2017

By: 

Jeremy D. Melville
SC Bar No. 77473
W. Mark White
SC Bar No. 7016
SPENCER & SPENCER, P.A.
226 East Main Street
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ATTORNEYS FOR RESPONDENT
CITY OF ROCK HILL

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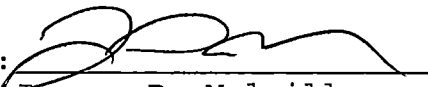
Of which City of Rock Hill is Respondent.

PROOF OF SERVICE

I certify that I have served the foregoing Motion for Extension of Time by depositing a copy in the United States Mail, postage prepaid, on April 3, 2017, addressed to council of record for Appellant as follows:

Richard B. Fennell
James, McElroy & Diehl, P.A.
600 College Street
Charlotte, NC 28202

SPENCER & SPENCER, P.A.

By: 
Jeremy D. Melville
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Rock Hill, SC 29731
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ATTORNEY FOR RESPONDENT
CITY OF ROCK HILL

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SC Court of Appeals

SPENCER & SPENCER
PROFESSIONAL ASSOCIATION

Attorneys and Counselors at Law

C.E. SPENCER (1849-1921)
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April 3, 2017

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

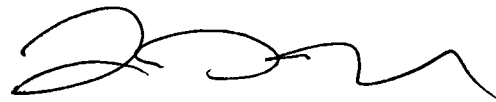
Re: Lucille H. Ray v. City of Rock Hill, et al.
Appellate Case No. 2016-002118

Dear Ms. Kitchings:

Enclosed please find a Motion for Extension of Time and Proof of Service in the matter referenced above, along with seven copies of the Motion. Also enclosed is a \$25.00 check for the motion fee. Please file these documents with the records of the Court and return clocked copies to me in the enclosed envelope. Please call if you need anything further.

Sincerely,

SPENCER & SPENCER, P.A.



Jeremy D. Melville

Enclosures

cc: Richard B. Fennell, Esq.

J

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04/03/2017
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To: The Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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Columbia, SC 29211

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