

STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM HORRY COUNTY

Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

RECEIVED

APR 19 2017

SC Court of Appeals

Case No.: 2014-CP-26-8261

Appellate No.: 2017-000015

Wylie Neil Doyle, Timothy Lee, Anthony J. Mottola, III and David Todd Appellants,

vs.

Horry County d/b/a Horry County Fire Rescue Respondent.

MOTION FOR EXTENSION OF TIME

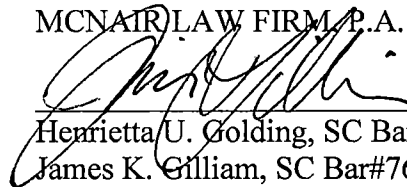
Respondent, Horry County, by and through their undersigned counsel, hereby request a thirty (30) day extension to file their Initial Brief and Designation of Matters to be included in the Record. This request is being made due to conflicts in the schedule of counsel. The Respondent is informed and believes that its Initial Brief and Designations are due on or before April 28, 2017. With the requested extension, the new due date would be May 30, 2017. Counsel for Appellants has consented to this request.

The Respondent has not previously requested, nor been granted, an extension for any purpose.

WHEREFORE, having fully set before this Court the grounds for this motion, the Respondent moves for an order granting a thirty (30) day extension of time for the filing of its Initial Brief.

Respectfully Submitted.

MCNAIR LAW FIRM, P.A.



Henrietta U. Golding, SC Bar#2173

James K. Gilliam, SC Bar#76695

McNair Law Firm, P.A.

Post Office Box 336

Myrtle Beach, South Carolina 29578

(843) 444-1107

Attorneys for Respondent

Myrtle Beach, South Carolina

April 17, 2017

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PROOF OF SERVICE

I, Carole Koerner, an employee of McNair Law Firm, P.A., attorneys for Respondent, in the above-entitled action, certify that I have served Respondent's Motion for Extension of Time and Proof of Service on Counsel of Record to this matter by depositing a copy in the United States Mail, first class, postage prepaid and Email on the 17th day of April, 2017 as follows:

OTHER COUNSEL OF RECORD:

J. Paul Porter, Esquire, SC Bar#100723
1418 Laurel Street, Suite A (29201)
Post Office Box 11675
Columbia, South Carolina 29211
Phone: (803) 799-9530
Fax: (803) 799-9533
Email: pporter@jlewisromerlaw.com
Attorneys for Appellants

Carole Koerner
Carole Koerner

MCNAIR
ATTORNEYS

April 17, 2017

James K. Gilliam

kgilliam@mcnair.net
T (843) 444-1107
F (843) 444-4729

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

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Re: Wylie Neil Doyle, et al. v. Horry County d/b/a Horry County Fire
Rescue
Case No.: 2014-CP-26-8261
Appellate Case No.: 2017-000015

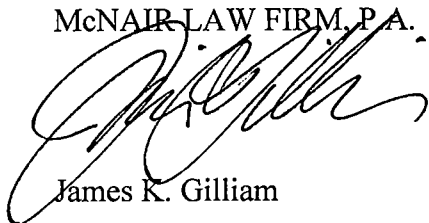
Dear Ms. Kitchings:

Enclosed for filing with the Court, please find original and seven (7) copies of Respondent's Motion for Extension of Time and Proof of Service in regard to the above matter. Also enclosed is a check in the amount of \$25.00 for the filing fee. Please return a filed copy of Respondent's Motion and Proof of Service in the envelope provided herein.

Pursuant to the Proof of Service, a copy of the aforementioned has been served on Counsel of Record.

Sincerely,

McNAIR LAW FIRM, P.A.



James K. Gilliam

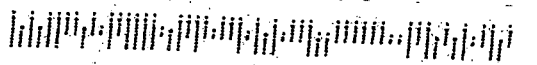
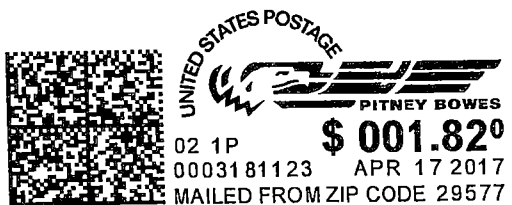
JKG/ck
Enclosures

cc: Horry County (*via email*)
J. Paul Porter, Esquire (*Via Email and U.S. Mail*)

McNAIR LAW FIRM, P.A.
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The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P. O. Box 11629
Columbia, South Carolina 29211

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