

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

APR 26 2017

The Honorable J.C. Nicholson, Jr.

**SC Court of Appeals**

Appellate Case No. 2016-002209

Steven Newbern and Claudia Newbern,..... Appellants,

v.

Ford Motor Company,.....Respondent.

CONSENT MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS' INITIAL  
REPLY BRIEF AND REPLY DESIGNATION OF MATTER

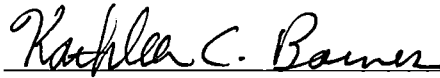
Appellants Steven Newbern and Claudia Newbern ("Appellants") move this Court for a ten-day extension in which to file the Initial Reply Brief of Appellants and Reply Designation of Matter to be included in the Record on Appeal. The Initial Reply Brief and Designation of Appellants is currently due on May 1, 2017. This is Appellants' first request for an extension for the Reply Brief and Designation. Appellants respectfully request an extension of ten days, making the Initial Reply Brief of Appellants and Reply Designation of Matter due on May 11, 2017. The undersigned contacted opposing counsel, and they do not object to this request.

*[Signature block appears on the following page.]*



April 24, 2017

Respectfully submitted,



Kathleen Chewning Barnes, SC Bar No. 78854

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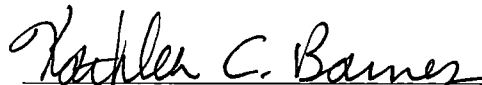
PROOF OF SERVICE

The undersigned certifies that a copy of the *Consent Motion for Extension of Time to File Appellants' Initial Reply Brief and Reply Designation of Matter* has been served upon the counsel of record listed below by mailing a copy of the same, postage prepaid, in the United States Mail, addressed as shown below this 24 day of April, 2017.

TURNER, PADGET, GRAHAM & LANEY, P.A.  
Kenneth Carter  
Carmelo B. Sammataro  
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April 24, 2017

  
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803-943-4529

# BARNES

LAW FIRM | LLC

Kathleen C. Barnes  
Admitted: Georgia | South Carolina

April 24, 2017

**Via U.S. Mail**

The Honorable Jenny Abbott Kitchings  
Clerk of Court for the Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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APR 26 2017

**SC Court of Appeals**

Re: *Steven Newbern and Claudia Newbern v. Ford Motor Company*,  
Appellate Case No. 2016-002209

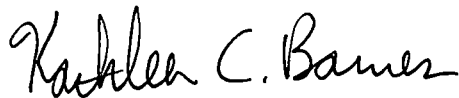
Dear Mrs. Kitchings:

Enclosed for filing in the above-referenced matter please find the original and seven copies of *Consent Motion for Extension of Time to File Appellants' Initial Reply Brief and Reply Designation of Matter* and a check in the amount of \$25.00 for the motion filing fee. Also enclosed is proof of service of the Motion. Please file the originals and return one file-stamped copy to me in the enclosed self-addressed, stamped envelope. By copy of this letter, I am serving all counsel of record with a copy of the same.

If you have any questions, please do not hesitate to contact me. Thank you.

With kind regards, I am,

BARNES LAW FIRM, LLC



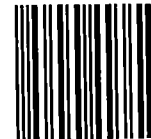
Kathleen C. Barnes

cc: Kenneth Carter  
Carmelo B. Sammataro  
Robert L. Wise  
Stephen E. Van Gaasbeck (via email)  
Raymond O. Bodiford (via email)  
William Applegate

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The Honorable Jenny Abbott Kitchings  
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