

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

C/A No. 2011-CP-40-6705

Case No. 2016-002446

RECEIVED

MAY 08 2017

SC Court of Appeals

Frank J. Cumberland, Jr., Jennifer B. Gardner,
and Michael R. Ugino Appellants,

v.

City of Columbia..... Respondent.

MOTION FOR EXTENSION OF TIME

In connection with the above-referenced appeal, Respondent files this Motion for Extension of Time. Respondent requests an extension of thirty (30) days for the deadline to file the Initial Brief of the Respondent and Respondent’s Designation of Matter. The requested extension, if granted, would make Respondent’s Initial Brief due on June 9, 2017. This Motion is not being made for purposes of delay. This is the first extension request in this matter. Counsel for Respondent has conferred with counsel for Appellants and opposing counsel does not object to this request.



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ATTORNEYS FOR RESPONDENT

Columbia, South Carolina
May 8, 2017

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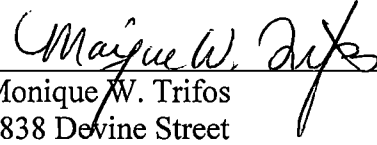
PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time and this proof of service by depositing a copy of the same in the United States Mail, postage prepaid, on May 8, 2017 at the address below:

C. Dixon Lee, III, Esquire
McLaren & Lee
1508 Laurel Street
Columbia, SC 29211

Gene M. Connell, Jr., Esquire
Kelaher Connell & Connor, PC
PO Drawer 14547
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RILEY POPE & LANEY, LLC

A handwritten signature in cursive script, reading "Monique W. Trifos", is written over a horizontal line.

Monique W. Trifos
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Attorney for Respondent

May 8, 2017

RILEY POPE & LANEY, LLC
ATTORNEYS AND COUNSELORS AT LAW

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SC Court of Appeals

HAND DELIVERED

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

Re: Frank J. Cumberland, Jr., Jennifer B. Gardner, and Michael R. Ugino v. City of
Columbia
Case No.: 2016-002466 / (CP-40-06705)
Our File No.: 5253.00415

Dear Ms. Kitchings:

Please find enclosed for filing an original and seven (7) copies of Respondent's Motion for Extension of Time along with an original and one (1) copy of proof of service. Please return one (1) filed copy of each to me with my courier. Also enclosed is my firm's check in the amount of \$25.00 to cover the filing fee.

If you have any questions, please let me know.

Sincerely,



Peter M. Balthazor

PMB/mwt

Enclosures

cc: C. Dixon Lee, III, Esquire (w/encl.)
Gene M. Connell, Jr., Esquire (w/encl.)
M. McMullen Taylor, Esquire (w/encl.)
Teresa A. Knox, Esquire (w/encl.)

✓