

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

Case No. 2016-002118

RECEIVED

MAY 25 2017

SC Court of Appeals

Lucille H. Ray, Appellant,

v.

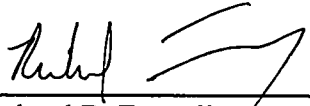
City of Rock Hill, South Carolina, a Municipal Corporation, and South Carolina Department of Transportation, an agency of the State of South Carolina, Defendants,

Of which City of Rock Hill is the Respondent.

MOTION FOR EXTENSION OF TIME

Appellant hereby moves the Court to extend the time to file and serve its initial reply brief and designation of matters to be included in the record on appeal by an additional thirty (30) days. Appellant shows the Court that the time for filing and serving its initial brief and designation has not expired, as Respondent's Initial Brief was served on May 19, 2017. Appellant respectfully moves the Court to extend the time to file and serve its initial reply brief until June 28, 2017, for the reason that Appellant needs additional time to prepare its brief.

May 25, 2017


Richard B. Fennell
S.C. Bar No.: 10467
James, McElroy & Diehl, P.A.
Charlotte, NC 28202
(704) 372-9870
Attorney for Appellant

Other Counsel of Record:

W. Mark White
Spencer & Spencer, P.A.
226 East Main Street
P.O. Box 790
Rock Hill, SC 29731
Attorneys for Respondent

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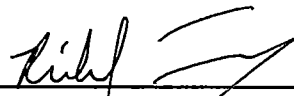
City of Rock Hill, South Carolina, a Municipal Corporation, and South
Carolina Department of Transportation, an agency of the State of South
Carolina, Defendants,

Of which City of Rock Hill is the Respondent.

MEMORANDUM IN SUPPORT OF MOTION FOR EXTENSION OF TIME

Appellant shows the Court that the time to submit Appellant's initial reply brief and has not yet expired, as Respondent served its Initial Brief on May 19, 2017. Appellant requires additional time to prepare its initial brief. Pursuant to Rules 240 and 263(b), SCACR, Appellant respectfully moves the Court to extend the time to file its initial reply brief by 30 days, up to and including June 28, 2017. Counsel for Respondent consents to this motion.

May 25, 2017.


Richard B. Fennell
S.C. Bar No.: 10467
James, McElroy & Diehl, P.A.
Charlotte, NC 28202
(704) 372-9870
Attorney for Appellant

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v.


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

Of which City of Rock Hill is the Respondent.

PROOF OF SERVICE

I certify that I have served this Motion for Extension of Time and Memorandum in
Support on the Respondent by depositing a copy of it in the United States Mail, postage prepaid,
on May 25, 2017, addressed to its attorneys of record, W. Mark White, Spencer & Spencer,
P.A., P.O. Box 790, Rock Hill, SC 29731.

May 25, 2017.


Richard B. Fennell
S.C. Bar No.: 10467
James, McElroy & Diehl, P.A.
Charlotte, NC 28202
(704) 372-9870
Attorney for Appellant



JAMES
McELROY
& DIEHL, P.A.
ATTORNEYS AT LAW

600 South College Street
Charlotte, North Carolina 28202

704 372-9870 | 800 247-9870
Fax 704 333-5508

www.jmdlaw.com

May 25, 2017

Via Hand-Delivery:

Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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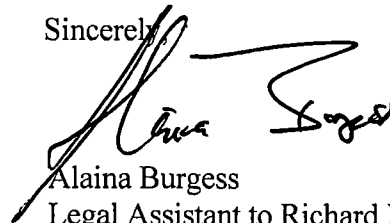
Re: *Lucille H. Ray v. City of Rock Hill, South Carolina, a Municipal Corporation, and South Carolina Department of Transportation, an agency of the State of South Carolina*
Appellate Case No. 2016-002118

Dear Sir or Madam:

Enclosed for filing please find an original and three copies of the Appellant's Motion for Extension of Time in the above-referenced matter. I have also enclosed a check in the amount of \$25.00 for the motion filing fee.

Thank you for your assistance, and please do not hesitate to contact our firm with any questions.

Sincerely,



Alaina Burgess
Legal Assistant to Richard B. Fennell

Enclosure

cc: Mark White

✓

HAND DELIVERY

JAMES, McELROY & DIEHL, P.A.
ATTORNEYS AT LAW
600 SOUTH COLLEGE STREET
CHARLOTTE, NORTH CAROLINA 28202

To:

Clerk of Court
South Carolina Court of Appeals*
1220 Senate Street
Columbia, SC 29201

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