

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM WILLIAMSBURG COUNTY

Court of Common Pleas

Clifton Newman, Circuit Court Judge

Appellant Case No: 2017-001077

**RECEIVED**

JUN 29 2017

SC Court of Appeals

April Grant, as Personal  
Representative of the Estate of  
Barrett Demetric Jeremiah Mack,

Respondent,

v.

Necole Binyard, as Personal  
Representative of the Estate of  
Harry Rufus Emanuel Washington,

Appellant.

MOTION FOR EXTENSION OF TIME  
TO FILE APPELLANT BRIEF

Pursuant to S.C. Appellate Court Rule 263(b), Appellant respectfully moves for a sixty-three (63) day extension of time, to and including, September 6, 2017, in which to file their appellant brief. Appellant's brief is currently due July 5, 2017. Appellant has not previously requested any extension of time to file their brief. Good cause exists for the requested extension, as set forth in detail below:

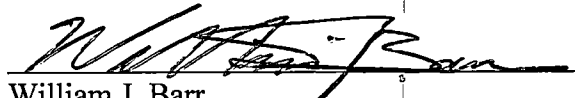


Counsel for Appellant has significant other professional commitments during the next 63 days, including (among others) hearing remanded on appeal in Florence County; bankruptcy hearings in the U.S. Bankruptcy Court; domestic relations trial in Charleston; hearings in Probate Court in Horry County, Florence County, and Williamsburg County; a trial in Clarendon County. Counsel has and continues to have a staffing shortage. Counsel hired an independent contractor to facilitate the timely completion of document and trial preparation, but the staffing shortage continues to be problem. Counsel for Appellant has at all times exercised diligence. A sixty-three (63) day extension for Appellant's brief would enable counsel to do the same in this Court, while at the same time fulfilling their obligations in other courts and other matters. No significant delay of this matter would harm the Respondent.

For these reasons, Appellant respectfully requests that this motion be granted and that they be allowed until and including September 6, 2017 in which to file their appellant brief.

Dated: June 26, 2017

Barr Law LLC



William J. Barr  
108 N. Academy Street  
Kingstree, SC 29556  
(843)355-5444  
Attorney for Appellant

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Appellant Case No: 2017-001077

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Camden, SC 29020  
Attorney for State Farm Automobile Mutual Insurance

Ashley B. Nance, Esquire  
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Florence, SC 29501  
Attorney for GEICO Insurance Company

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PROOF OF SERVICE

I certify that I have served the MOTION FOR EXTENSION OF TIME TO FILE APPELLANT BRIEF by depositing a copy of it in the United States Mail, postage prepaid, on June 26, 2017, addressed to the following attorneys of record:

Charles R. Norris, Esquire  
Nelson Mullins Riley & Scarborough LLP  
151 Meeting Street, 6<sup>th</sup> Floor  
Charleston, SC 29401-2239  
Attorney for State Farm

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June 26, 2017



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June 26, 2017

Jenny Abbott Kitchings  
Clerk of the Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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JUN 29 2017

SC Court of Appeals

**Re: April Grant, as Personal Representative of the Estate of Barrett Demetric Jeremiah Mack, Respondent, v. Necole Binyard, Appellant**  
**Appellant Case No: 2017-001077**

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the Motion for Extension of Time to File Appellant Brief and the Proof of Service. Please return one filed copy of the Motion and the Proof to my offices in the enclosed self-addressed, stamped envelope. Also enclosed in our check in the amount of \$25.

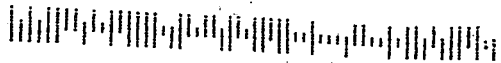
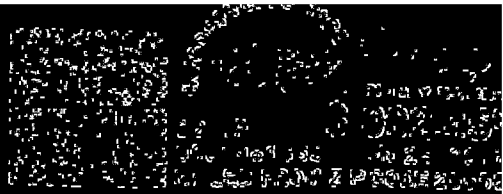
Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact our offices.

Sincerely;

A handwritten signature in black ink, appearing to read "William J. Barr".

William J. Barr, Esquire

WJB/rs  
Enclosures as stated



William J. Barr  
Barr Law LLC  
108 N. Academy St.  
Kingstree, SC 29556

Jenny Abbott Kitchings  
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South Carolina Court  
of Appeals  
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