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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

S. Jackson Kimball, Special Circuit Court Judge

Appellate Case No. 2017-001367

**RECEIVED**

JUL 13 2017

**SC Court of Appeals**

Elizabeth Hope Rainey, as the  
Appointed Guardian ad Litem to  
Owen C., a minor .....Appellant,

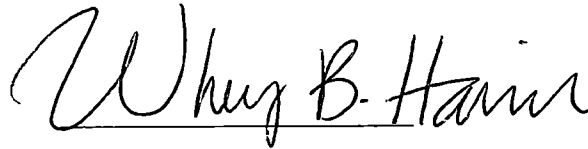
v.

South Carolina Department of  
Social Services.....Respondent.

**MOTION FOR EXTENSION**

Appellant respectfully requests a thirty (30) day extension of time to file her Initial Brief in this matter due to previously scheduled matters. The current deadline is July 17, 2017. If granted, the new deadline for the Initial Brief would be August 18, 2017.

Respectfully submitted,



July 13, 2017  
Columbia, SC

Whitney B. Harrison  
McGowan, Hood & Felder, LLC  
1517 Hampton Street  
Columbia, SC 29201  
(803) 779-0100  
[wharrison@mcgowanhood.com](mailto:wharrison@mcgowanhood.com)  
ATTORNEY FOR APPELLANT



THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**PROOF OF SERVICE**

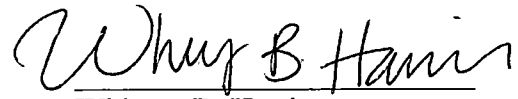
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The undersigned hereby certifies that on July 13, 2017, she served counsel for Respondent with the *Motion for Extension and Notice of Receipt of Hearing Transcript* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

Patrick J. Frawley  
Davis Frawley Law Firm  
Post Office Box 489  
Lexington, SC 29071

*Signature Page to Follow*

Respectfully submitted,

A handwritten signature in black ink that reads "Whitney B. Harrison". The signature is written in a cursive style with a horizontal line underneath the name.

Whitney B. Harrison  
McGowan, Hood & Felder, LLC  
1517 Hampton Street  
Columbia, SC 29201

# McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC) S.  
Randall Hood  
John G. Felder, Jr.  
W. Jones Andrews, Jr.  
Jordan C. Calloway  
Susan F. Campbell  
Deborah Casey (NC)\*  
Ashley White Creech  
Shawn B. Deery  
Chance Farr (NC)



Whitney B. Harrison  
Lara Pettiss Harrill  
Patrick M. Killen  
William A. McKinnon (SC,DC)  
Anna S. Magann  
Robert V. Phillips  
James Stephen Welch\* (SC,OK)  
Joseph G. Wright, III\*  
Of Counsel\*

*writers email: [wharrison@mcgowanhood.com](mailto:wharrison@mcgowanhood.com)*

July 13, 2017

**RECEIVED**

JUL 13 2017

**SC Court of Appeals**

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

RE: *Elizabeth Hope Rainey, v. South Carolina Department of Social Services*  
Appellate Case No. 2017-001367

Dear Ms. Kitchings,

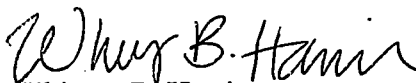
The hearing transcript in the above referenced matter have been received by Appellant's counsel. Counsel received the transcript the week of the filing of the Notice of Appeal, and thus pursuant to Rule 208, SCACR, the due date for the initial brief is July 19, 2017, thirty days from the filing of the notice of appeal.

I am also writing to seek a thirtyday extension for the filing of the initial brief. If granted, the new deadline for the Initial Brief would be August 18, 2017. I ask that all filing deadlines be held in abeyance pending a decision on this request for an extension.

Enclosed please find the original and seven (7) copies of Appellant's Motion for Extension. Please return a clocked copy of the Motion. I am also enclosing a check from our firm in the amount of \$25.00 to cover the filing fee for this motion. If you have any questions or concerns, please do not hesitate to contact me.

With kind regards,

Sincerely,

  
Whitney B. Harrison

cc:

Patrick Frawley, Esquire  
Enclosures