

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 minorAppellant,

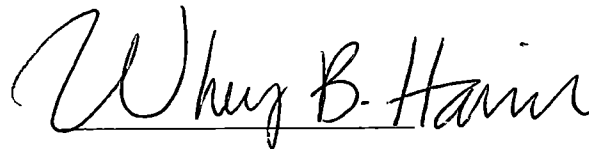
v.

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
ATTORNEY FOR APPELLANT



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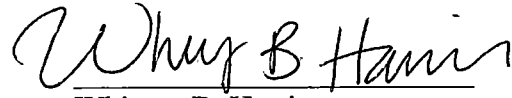
PROOF OF SERVICE

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, reading "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)
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Robert V. Phillips
James Stephen Welch* (SC,OK)
Joseph G. Wright, III*
Of Counsel*

writers email: wharrison@mcgowanhood.com

July 13, 2017

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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,

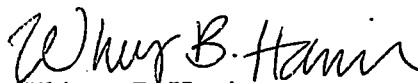
The hearing transcript in the above referenced matter have been received by Appellant's counsel. Counsel received the transcript the week of the filing of the Notice of Appeal, and thus pursuant to Rule 208, SCACR, the due date for the initial brief is July 19, 2017, thirty days from the filing of the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