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**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Richland County
Court of Common Pleas

Jean Hoefer Toal, Circuit Court Judge

Case No. 2016-CP-40-00067

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JUL 19 2017

SC Court of Appeals

Earl Kinley,

Respondent,

v.

Waste Management of South Carolina, Inc., and
Chambers Richland County Landfill, Inc.,

Appellants.

**APPELLANTS' MOTION FOR SECOND EXTENSION OF TIME
TO FILE/SERVE RETURN TO MOTION TO DISMISS APPEAL**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Duke R. Highfield (SC Bar No. 64224)
Jeffrey J. Wiseman (SC Bar No. 73121)
Russell G. Hines (SC Bar No. 72100)
William O. Sweeny IV (SC Bar No. 79829)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Counsel for Appellants



NOW COME Appellants, Waste Management of South Carolina, Inc., and Chambers Richland County Landfill, Inc., pursuant to Rule 263(b), SCACR, and hereby move for four (4) additional days' time to file/serve their return to Respondent's Motion to Dismiss Appeal and for Expedited Review (the "Subject Motion").


1. On June 27, 2017, Respondent served the Subject Motion. Based on its date of service, under Rule 240(e), SCACR, Appellants' original deadline to file/serve their return to the Subject Motion was July 7, 2017.

2. In accordance with Rule 263(b), on account of other time commitments (work- and non-work related), by letter of July 7, 2017, Appellants' counsel requested that the deadline for Appellants' return be extended by ten (10) days, i.e., through today, July 17, 2017, and the Court granted this request by order of today's date.

3. Now, again due to other time commitments, both work- and non-work-related, the undersigned counsel for Appellants requests four (4) additional days beyond today's date (July 17, 2017), i.e., through this coming Friday, July 21, 2017, to finish preparation of Appellants' return to the Subject Motion and submits that there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice, and it will not work any undue prejudice upon any other party.

WHEREFORE, Appellants respectfully request that this Honorable Court allow them four (4) additional days beyond today's date (July 17, 2017), i.e., through this coming Friday, July 21, 2017, to file/serve their return to the Subject Motion. Additionally, Appellants respectfully request that the Court hold their present deadline in abeyance until it acts upon this motion.

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

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Duke R. Highfield (SC Bar No. 64224)
Jeffrey J. Wiseman (SC Bar No. 73121)
Russell G. Hines (SC Bar No. 72100)
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(843) 720-5488

Counsel for Appellants

Charleston, South Carolina

Dated: 7/17/17

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Counsel for Appellants

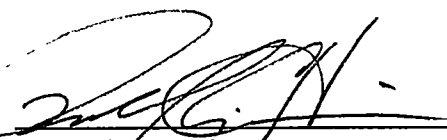
I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, hereby certify that the foregoing **APPELLANTS' MOTION FOR SECOND EXTENSION OF TIME TO FILE/SERVE RETURN TO MOTION TO DISMISS APPEAL** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on July 17, 2017, properly posted for delivery to the following addressees:

Shane M. Burroughs, Esquire
David C. Marshall, Esquire
LANIER & BURROUGHS, LLC
P.O. Drawer 2789
Orangeburg, SC 29116

-and-

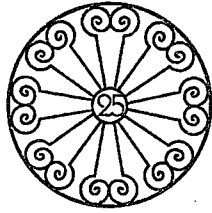
Vincent A. Sheheen, Esquire
SAVAGE, ROYALL & SHEHEEN, L.L.P.
P.O. Drawer 10
Camden, SC 29021
Counsel for Respondent

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines (SC Bar No. 72100)
Counsel for Appellants

Charleston, South Carolina

Dated: 7/17/17



YCR LAW

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: kbarnes@ycrlaw.com

July 17, 2017

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

Re: Earl Kinley v. Loveless and Loveless, Inc.; Waste Management of South
Carolina, Inc.; and Chambers Richland County Landfill, Inc.
Appellate Case No.
Case No.: 2016-CP-40-0067
Claim No.: 003000-328503-GB-01
Date of Loss: 5/29/2012
YCR File: 5251-20150606

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SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter please find the original and seven (7) copies of Appellants' Motion for Second Extension of Time to File/Serve Return to Motion to Dismiss Appeal and the original and one (1) copy of the Proof of Service for the same. I am also enclosing our firm's check in the amount of \$25.00 representing the filing fee. Kindly file the originals and return court-stamped copies to me in the enclosed envelope.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes
Secretary

Enclosures

cc: David C. Marshall, Esquire, Lanier & Burroughs, LLC
Vincent A. Sheheen, Esquire, Saqvage, Royall & Sheheen, LLP
Shane M. Burroughs, Esquire, Lanier & Burroughs, LLC

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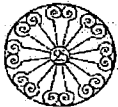
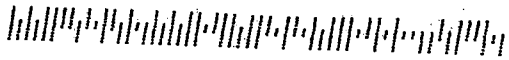
07/17/2017

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