

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

John C. Hayes, III, Circuit Court Judge

Case No. 2014-CP-46-1307

**RECEIVED**

JUL 26 2017

**SC Court of Appeals**

Russell Shane Carter ..... Respondent/Appellant,

v.

Bruce Bryant, as Representative for  
the Office of the York County Sheriff ..... Appellant/Respondent.

**MOTION FOR EXTENSION**

Pursuant to Rule 240, SCACR, Respondent/Appellant Russell Shane Carter requests a 15-day extension of the deadline for filing his initial brief of appellant and designation of matter to be included in the record on appeal. The current deadline is July 26, 2017. This is the fourth request for an extension of this deadline.

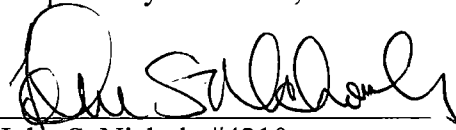
Counsel posits the following extraordinary circumstances supporting this request:

- A. Counsel continues to deal with a family illness in Florence, South Carolina, requiring unexpected trips to Florence;
- B. Counsel was involved in a significant mediation and depositions out of state and has not had an opportunity to edit the brief;
- C. Counsel consulted with counsel for Appellant/Respondent who does not oppose this request.



July 26, 2017

Respectfully submitted;

A handwritten signature in black ink, appearing to read "John S. Nichols", written over a horizontal line.

John S. Nichols #4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, South Carolina 29202

(803) 779-7599

Attorney for Respondent/Appellant

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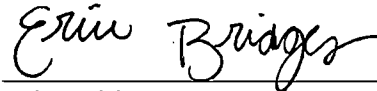
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**PROOF OF SERVICE**

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The undersigned hereby certifies that on the date indicated below she served  
counsel of record with a copy of the *Motion for Extension* by mailing copies of the same  
by United States Mail with first class postage prepaid to the following address:

Andrew F. Lindemann  
Robert D. Garfield  
Davidson & Lindemann, PA  
PO Box 8568  
Columbia, SC 29202-8568



Erin Bridges

July 26, 2017



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

July 26, 2017

**VIA HAND DELIVERY**

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RECEIVED

JUL 26 2017

SC Court of Appeals

RE: Russell Carter v. Bruce Bryant  
Case Tracking No.: 2016-002556

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to the above matter. I have also enclosed a proof of service of this document on counsel for the Appellant/Respondent and a \$25.00 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges  
Paralegal to John S. Nichols  
BLUESTEIN, NICHOLS,  
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: J. Christopher Mills, Esquire  
Alex T. Postic, Esquire  
Andrew F. Lindemann, Esquire  
Robert D. Garfield, Esquire