

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

CASE NO. 2016-CP-26-1614

RECEIVED

AUG 21 2017

SC Court of Appeals

Robert Palmer Appellant

vs.

State of South Carolina, Horry County and David Weaver..... Defendants

Of which State of South Carolina is the..... Respondent


MOTION TO EXTEND TIME TO FILE
APPELLANT'S REPLY BRIEF

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellant, moves this Court for an Order extending the time to file Appellant's Reply Brief in the captioned case. Appellant received Respondent's Initial Brief on August 16, 2017. Respondent's letter filing the Brief with the Court and the Certificate of Service on Appellant are dated August 11, 2017. Under the Rules, Appellant's Reply Brief would be due Monday, August 21, 2017. Appellant's counsel is already engaged in complicated and protracted issues in other cases and respectfully requests the Court grant him until August 31, 2017 to file Appellant's Reply Brief.

Respectfully submitted,

(SIGNATURE ON FOLLOWING PAGE)





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August 18, 2017

Attorneys for Appellant

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PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of the **Motion to Extend Time to File Appellant's Reply Brief** on the Respondents, on the 18th day of August, 2017, by depositing a copy of same in the United States Mail, postage prepaid, to:

Lisa A. Thomas, Esquire
Thompson & Henry, P.A.
P. O. Box 1740
Conway, SC 29528

Andrew F. Lindemann, Esquire
Davidson & Lindemann, P.A.
P. O. Box 8568
Columbia, SC 29202

J. Emory Smith, Jr., Esquire
Robert D. Cook, Esquire
Alan Wilson, Esquire
Office of Attorney General
P. O. Box 11549
Columbia, SC 29211

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 18th day of August, 2017.

[Signature]
Notary Public for South Carolina
My Commission Expires: 2-17-19

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

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SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*

GENE M. CONNELL, JR.

L. SIDNEY CONNOR, IV

LISA POE DAVIS

* OF COUNSEL

AREA CODE 843

238-5648

FAX: 238-5050

August 18, 2017

VIA FACSIMILE: 1-803-734-1839

AND U.S. MAIL

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

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SC Court of Appeals

Re: Appellate Case No. 2017-000567
Robert Palmer vs. State of South Carolina, Horry County and David Weaver
C/A No. 2016-CP-26-1614
Our File No. 2015-0325C

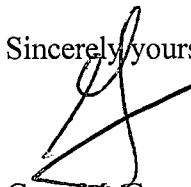
Dear Ms. Kitchings:

Respondent's Initial Brief was filed and served on August 11, 2017 making Appellant's Reply Brief due on August 21, 2017. However, I did not receive Respondent's Brief until August 16, 2017 and respectfully request the Court grant me until August 31, 2017 to file Appellant's Reply Brief.

An original and seven (7) copies of a Motion to Extend Time to File Appellant's Reply Brief and Proof of Service is being filed and served this date via U.S. Mail along with a check for \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope provided.

With best regards, I am

Sincerely yours,

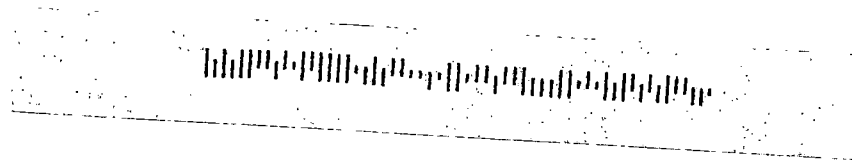


Gene M. Connell, Jr.

GMC,Jr.:sm

Enclosures via U.S. Mail

cc w/enc. via U.S. Mail: Lisa A. Thomas, Esquire
Andrew F. Lindemann, Esquire
J. Emory Smith, Jr., Esquire
Roger Dale Johnson, Esquire



KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

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