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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

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Appellate Case No. 2017-001930

OCT 16 2017

SC Court of Appeals

Norris Earl White Jr.,

Appellant,

v.

City of North Charleston

Respondent.

**MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
INITIAL BRIEF OF APPELLANT AND DESIGNATION OF
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL
ON BEHALF OF NORRIS EARL WHITE JR.**

Milton Demetrios Stratos II
SC Bar No.: 102108
Joye Law Firm, L.L.P.
5861 Rivers Avenue (29406)
P.O. Box 62888
North Charleston, SC 29419-2888
(843) 554-3100

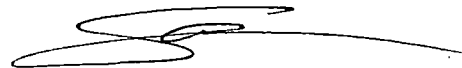
Attorney for Appellant
Norris Earl White Jr.

✓

Pursuant to Rule 240, SCACR, Appellant Norris White Jr. (“Appellant”) moves for an extension of time in which to serve and file Appellant’s Initial Brief and Designation of Matter to be Included in the Record on Appeal (“Designation of Matter”). Appellant respectfully requests an extension of thirty days to file the Initial Brief and Designation of Matter which are currently due on October 18, 2017. The deadline for Appellant’s Initial Brief and Designation of Matter has not been extended previously.

The grounds for this motion are that other impending professional matters and obligations have created a need for additional time to prepare the Initial Brief and Designation of Matter. A thirty day delay will not prejudice the rights of any of the parties. We have notified counsel for the parties of our intent to file this motion and received no objections. Granting this motion would require the Initial Brief and Designation of Matter to be filed with the Court on November 18, 2017.

For these reasons, Appellant respectfully requests an extension of the deadline for filing and serving the Initial Brief and Designation of Matter until November 17, 2017.



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Attorney for Appellant
Norris Earl White Jr.

Dated this 13 day of October, 2017.

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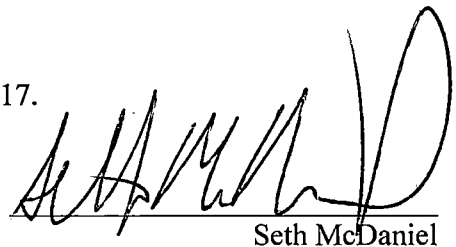
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PROOF OF SERVICE

I certify that I have served Norris White Jr.'s **Motion for Extension of Time to Serve and File the Initial Brief and Designation of Matter** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, on October 13, 2017, in an envelope addressed as follows:

Other Counsel of Record:
Robin Lilley Jackson, Esq.
PO Box 12279
Charleston, SC 29422
(843) 556-4045
Attorney for Respondent
City of North Charleston

Dated this 13 day of October, 2017.


Seth McDaniel



Charleston Myrtle Beach Clinton Columbia

Please Reply To:
Joye Law Firm, L.L.P.
5861 Rivers Avenue (29406)
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North Charleston, SC 29419-2888

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Milt Stratos
Email: mstratos@joyelawfirm.com

August 11, 2017

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OCT 16 2017

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629 (29211)
1015 Sumter Street
Columbia, S.C. 29201

RE: Norris White Jr. v. City of North Charleston
Appellate Case No. 2017-001930

Dear Ms. Kitchings:

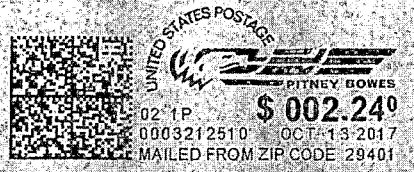
Pursuant to SCACR 240, enclosed for filing please find the original and seven copies of the Motion for Extension of Time to Serve and File the Initial Brief and Designation of Matter to be Included in the Record on Appeal on behalf of the Appellant Norris White Jr. Our check in payment of your filing fee is also enclosed. By copy of this letter we are serving the motion on counsel for all parties of record in the lower court proceeding. Please stamp and return the extra copy of the motion in the enclosed envelope as proof of filing.

With best wishes, I am

Very truly yours,

Milt Stratos II

Mds/mds
Enclosures
cc: Robin Lilley Jackson, esq. (via U.S. Mail)



5861 Rivers Avenue
North Charleston, SC 29406

**The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201**



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SC COURT OF APPEALS

