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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
OCT 18 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 respondent and designation of matter to be included in the record on appeal. The current deadline is October 20, 2017. This is the third request for an extension of this deadline.

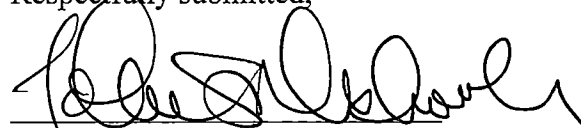
Counsel posits the following extraordinary circumstances supporting this request:

- A. Counsel is assuming a position that will require him to wind up his active practice of law as of November 1, 2017. Therefore counsel has been taking steps to complete projects and obtain substitute counsel for many of the cases. This has been a time consuming process.
- B. Counsel participated in an 7-day murder trial in September 2017 and a 10-day products liability trial in October 2017. Both of these trials were unanticipated.

✓

C. Counsel for Appellant/Respondent has consented to this request.

Respectfully submitted,

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

October 18, 2017

John S. Nichols #4210

BLUESTEIN THOMPSON SULLIVAN, LLC

Post Office Box 7965

Columbia, South Carolina 29202

(803) 779-7599

Attorney for Respondent/Appellant

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PROOF OF SERVICE

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

October 18, 2017

October 18, 2017

VIA HAND DELIVERY

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

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OCT 18 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 an *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 THOMPSON SULLIVAN, LLC

/emb

Enclosures

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