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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

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Hon. S. Jackson Kimball, III
Special Circuit Court Judge
York County Master in Equity

NOV 20 2017
SC Court of Appeals

Case no. 2017-CP-46-00867

Michael Frank, individually, and as the parent and guardian of a
minor,Appellant


vs.

South Carolina Department of Social Services.....Respondents

APPELLANT NOTICE OF MOTION AND MOTION
FOR EXTENSION TO FILE INITIAL BRIEF

Appellant counsel respectfully moves the Court of Appeals for an extension of thirty (30) days in which to file Appellant Initial Brief. The grounds for the requested relief is that Appellant Counsel has two (2) pending matter for trial in the Court of Common Pleas the week of December 4, 2017. Counsel certifies that the last transcript of hearing was received November 2, 2017 making the due date for Appellant's brief currently scheduled December 2, 2017 (Saturday).

Appellant respectfully requests the court assign due date for Appellant's Initial Brief as January 4, 2017. Pursuant to the undersigned's duty of consultation Appellant Counsel has communicated with opposing counsel who indicates no objection to the relief being sought by motion.


J. Cameron Halford
238 Rockmont Drive
Fort Mill, South Carolina 29708
803-547-6618



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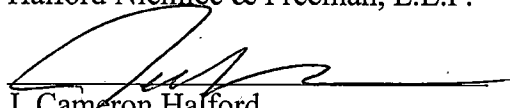
South Carolina Department of Social Services.....Respondents

PROOF OF SERVICE

I hereby certify that I am the attorney for the Appellant in the above case and that I did on November 17, 2017 serve a copy of the foregoing NOTICE AND MOTION FOR EXTENSION TO FILE APPELLANT INITIAL BRIEF on counsel for the Defendant by fax and by depositing a copy of the same in the United States mail, postage prepaid, and addressed as follows:

Walter Keith Martens, Esquire
Hamilton Martens, LLC
Post Office Box 10940
Rock Hill, SC 29731
Attorney for Defendant

Halford Niemiec & Freeman, L.L.P.


J. Cameron Halford
238 Rockmont Drive,
Fort Mill, South Carolina 29708

LAW OFFICES

HALFORD, NIEMIEC & FREEMAN, L.L.P.

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November 17, 2017

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SC Court of Appeals

Jenny Abbott Kitchings, Clerk of Court
The South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

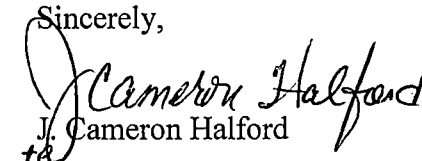
Re: Michael Frank, individually, and as the parent of a minor vs. South Carolina
Department of Social Services
Civil Case No.: 2017-CP-46-00867
Appellate Case No.: 2017-002024

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the Appellant's Motion Requesting Extension of Time to File Initial Brief regarding the above-referenced matter. Additionally, I have enclosed the original and one copy of the Appellant Notice of Substitution of Counsel. In this regard, I would appreciate your filing these documents and return the clocked copies to my office in the envelope provided. I have also enclosed my check in the amount of \$25.00 for the cost of the Motion fee. If you have any questions regarding the enclosed or this matter, please do not hesitate to contact my office.

With kind personal regards, I am

Sincerely,


J. Cameron Halford

JCH:tml

Enclosures

cc: Mr. Michael Frank
w/enclosures
W. Keith Martens, Esquire (via fax and regular mail)
w/enclosures

^ MEDIATOR AND ARBITRATOR

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SHIP TO: Jenny Kitchings
Clerk of Court
S.C. Court of Appeals
1220 Senate Street
Columbia SC 29201-3769



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SC Court of Appeals