

85264

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master-In-Equity

RECEIVED

NOV 29 2017

SC Court of Appeals

Case No.: 2017-001628

Ann M. BlandinRespondent-Appellant,

-v-

City of North CharlestonAppellant-Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENT-APPELLANT'S
INITIAL BRIEF AND DESIGNATION OF MATTER**

PLEASE TAKE NOTICE that the Respondent-Appellant, Ann M. Blandin, by and through her undersigned counsel, moves for a thirty (30) day extension of time within which to file her initial brief and designation of matter. Respondent-Appellant's initial brief is currently due by December 4, 2017. The reason for this request is that counsel for the Respondent-Appellant, John E. Parker and William F. Barnes, III, are currently scheduled to start a date certain trial on November 27, 2017 in the Richland County Court of Common Pleas.

For these reasons, the undersigned moves for an extension of time pursuant to Rule 263(a), SCACR. The grounds for the Respondent-Appellant's request are due to numerous schedule conflicts and deadlines that has not allowed counsel adequate preparation time to complete these matters. The undersigned attorney for the Respondent-Appellant hereby certifies


that he has consulted with counsel for Appellant-Respondent, Robert H. Hood, Jr., who consents to Respondent-Appellant's request for an additional thirty (30) day extension of time to file her initial brief and designation of matter.

Counsel for the Respondent-Appellant therefore requests the Initial Brief and Designation of Matter be due for service on January 3, 2018.

Respectfully submitted,

PETERS, MURDAUGH, PARKER, ELTZROTH
& DETRICK, P.A.

November 16, 2017
Hampton, South Carolina

BY: 

John E. Parker
William F. Barnes, III
101 Mulberry Street, East
P.O. Box 457
Hampton, SC 29924
Phone: (803) 943-2111
Email: jparker@pmped.com
Email: wbarnes@pmped.com

-And-

Lawrence C. Kobrovsky, Esquire
123 Meeting Street
Charleston, SC 29401
Phone: (843) 853-3703
Email: kobrovskyl@bellsouth.net

Attorneys for Respondent-Appellant

Other Counsel of Record:

Robert H. Hood, Jr., Esquire
William G. DesChamps, IV, Esquire
Hood Law Firm, LLC
Post Office Box 1508
Charleston, SC 29402

Attorneys for Appellant-Respondent

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

NOV 29 2017

The Honorable Mikell R. Scarborough, Master-In-Equity

SC Court of Appeals

Case No.: 2017-001628

Ann M. BlandinRespondent-Appellant,

-v-


City of North Charleston, Appellant-Respondent.

CERTIFICATE OF SERVICE

This is to certify that I, **Megan C. Davis**, with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Attorneys for the Respondent-Appellant, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within the **Appellant's Motion for an Extension of Time to File Respondent-Appellant's Initial Brief and Designation of Matter** to:

Robert H. Hood, Jr., Esquire
William G. DesChamps, IV, Esquire
Hood Law Firm, LLC
Post Office Box 1508
Charleston, SC 29402

William J. Horvath, Esquire
Turner Padget Graham & Laney, PA
Post Office Box 22129
Charleston, SC 29413


Megan C. Davis

November 16, 2017
Hampton, South Carolina

LAW OFFICES
PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK

PROFESSIONAL ASSOCIATION

OVER 100 YEARS OF LEGAL SERVICE-EST. 1910

JOHN E. PARKER
DANIEL E. HENDERSON
MARK D. BALL
RANDOLPH MURDAUGH, IV
RONNIE L. CROSBY
R. ALEXANDER MURDAUGH
BERT G. UTSEY, III
RANDOLPH MURDAUGH, III
GRAHAME E. HOLMES
LEE D. COPE
MATTHEW V. CREECH
LEAGUE B. CREECH
STEVEN D. MURDAUGH
WILLIAM F. BARNES, III
AUSTIN H. CROSBY
NEIL E. ALGER

RANDOLPH MURDAUGH, SR.
(1887-1940)
RANDOLPH MURDAUGH, JR.
(1915-1998)
J. ROBERT PETERS, JR.
(1927-2008)
J. PAUL DETRICK
(1948-2016)
CLYDE A. ELTZROTH, JR. - RET

November 16, 2017

William F. Barnes, III
Direct Dial: (803) 914-6702
Email: wbarnes@pmped.com
Paralegal: mdavis@pmped.com

The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, SC 29211-1629

*Re: Ann Blandin v. City of North Charleston
Appellate Case No.: 2017-001628*

RECEIVED
NOV 29 2017
SC Court of Appeals

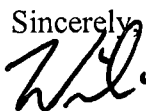
Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of Respondent-Appellant's Motion for Extension of Time in the above-referenced case. Please file the original and return a clocked copy of same in the self-addressed stamped envelope provided.

In addition, please find our check in the amount of \$25.00 for the filing fee.

By copy of this letter, all counsel of record is being notified of our request for an extension of time.

With kind regards, I am

Sincerely,


William F. Barnes, III

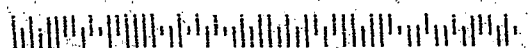
WFB/mcd
Enclosures as stated

cc: Robert H. Hood, Jr., Esquire
William G. DesChamps, IV, Esquire
Deborah Harrison Sheffield, Esquire
Lawrence C. Kobrovsky, Esquire



ZIP 29924 \$ 001.82⁰
02 1W
0001388445 NOV. 16. 2017.

First Class Mail



PMPED

PETERS | MURDAUGH | PARKER | ELTZROTH | DETRICK
101 Mulberry Street East
Post Office Box 457
Hampton, South Carolina 29924

RECEIVED

NOV 29 2017

SC Court of Appeals

TO:

The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, SC 29211-1629