

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

S. Jackson Kimball, Special Circuit Court Judge

Appellate Case No. 2017-001367

Elizabeth Hope Rainey, as the
Appointed Guardian ad Litem to
Owen C., a minorAppellant,

v.

South Carolina Department of
Social Services.....Respondent.

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DEC 06 2017
SC Court of Appeals

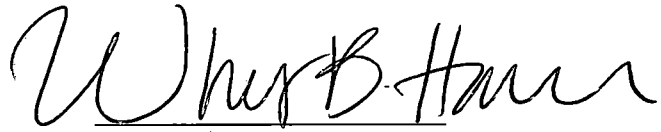
MOTION FOR EXTENSION

Appellant’s counsel respectfully requests a 15 day extension of time to file her Initial Reply Brief in this matter due to a medical procedure on her hand involving skin grafts. Counsel is currently working modified hours and the writing/typing process is inherently slower given the nature of the injury. The current deadline is December 8, 2017. If granted, the new deadline for the Initial Reply Brief would be December 23, 2017.

Signature Page to Follow

Respectfully submitted,

December 6, 2017
Columbia, SC

A handwritten signature in black ink, appearing to read "Whitney B. Harrison". The signature is written in a cursive style with a large initial "W".

Whitney B. Harrison
McGowan, Hood & Felder, LLC
1517 Hampton Street
Columbia, SC 29201
(803) 779-0100
wharrison@mcgowanhood.com
ATTORNEY FOR APPELLANT

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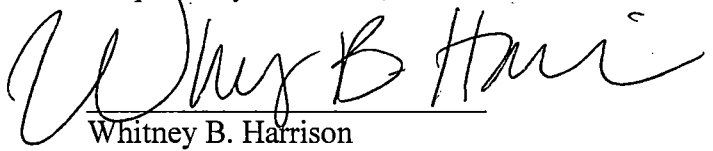
PROOF OF SERVICE

The undersigned hereby certifies that on December 6, 2017, she served counsel for Respondent with the *Motion for Extension* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

Patrick J. Frawley
Davis Frawley Law Firm
Post Office Box 489
Lexington, SC 29071

Signature Page to Follow

Respectfully submitted,

A handwritten signature in black ink, reading "Whitney B. Harrison". The signature is written in a cursive style with a large initial "W".

Whitney B. Harrison
McGowan, Hood & Felder, LLC
1517 Hampton Street
Columbia, SC 29201

McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC) S.
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John G. Felder, Jr.
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Jordan C. Calloway
Susan F. Campbell
Deborah Casey (NC)*
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Whitney B. Harrison
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James Stephen Welch* (SC,OK)
Joseph G. Wright, III*
Of Counsel*

writers email: wharrison@mcgowanhood.com

December 6, 2017

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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RE: *Elizabeth Hope Rainey, v. South Carolina Department of Social Services*
Appellate Case No. 2017-001367

Dear Ms. Kitchings,

I am writing to seek a 15 day extension for the filing of the initial reply brief. If granted, the new deadline for the Initial Brief would be December 23, 2017. I ask that all filing deadlines be held in abeyance pending a decision on this request for an extension.

Enclosed please find the original and seven (7) copies of Appellant's Motion for Extension. Please return a clocked copy of the Motion. I am also enclosing a check from our firm in the amount of \$25.00 to cover the filing fee for this motion. If you have any questions or concerns, please do not hesitate to contact me.

With kind regards,

Sincerely,

Whitney B. Harrison

cc:

Patrick Frawley, Esquire
Enclosures