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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Kristi L. Harrington, Circuit Court Judge

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DEC 06 2017
SC Court of Appeals

Case No.: 2017-001930

Norris Earl White, Jr., Appellant,

v.

City of North Charleston, Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE AND SERVE
INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

ROBIN L. JACKSON
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Attorney for Respondent

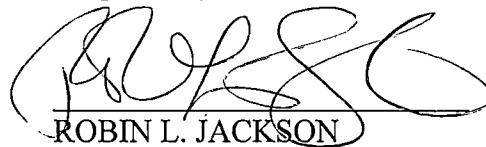
✓

Comes now the Respondent, City of North Charleston, and respectfully moves pursuant to Rule 263(b), SCACR, for an extension of time in which to file and serve Respondent's Initial Brief and Designation of Matter to Be Included in the Record on Appeal. Respondent respectfully requests an extension of thirty days to file the Initial Brief and Designation of Matter which are currently due on December 18, 2017. The deadline for Respondent's Initial Brief and Designation of Matter has not been previously extended and no prior extensions have been requested. Additionally, counsel has conferred with Appellant's counsel and he consents to this request.

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.

Therefore, the Respondent respectfully asks this court to grant a 30-day extension of time in which to file and serve the Initial Brief and Designation of Matter to be Included in the Record on Appeal. Respondent, submits that, if this motion is granted, the new deadline would be January 18, 2018.

Respectfully moved,



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Attorney for Respondent

December 4, 2017
Charleston, South Carolina

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In the Court of Appeals

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Kristi L. Harrington, Circuit Court Judge

Case No.: 2017-001930

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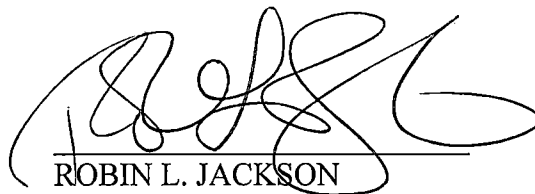
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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File and Serve Initial Brief of Respondent in the foregoing matter on Norris Earl White, Jr., by depositing a copy of it in the United States Mail, postage prepaid, on December 4, 2017, addressed to his attorney of record, Milt Stratos, II Esquire, Joye Law Firm, P.O. Box 62888, North Charleston. SC 29419-2888.



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December 4, 2017

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

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RE: White v. North Charleston Police Department
Case No.: 2015-CP-10-6561
IRF Claim No.: 16319


Dear Madame Clerk:

Enclosed for filing, please find the original and seven (7) copies of Respondent's Motion for Extension of Time to File and Serve Initial Brief and Designation of Matter, Proof of Service, and our firm's check in the amount of \$25.00 for the motion filing fee with regard to the above referenced case. If you would please, kindly file the original and return the stamped copies to my office in the self-addressed stamped envelope provided here-in. By way of this correspondence, I am also serving opposing counsel of record with the same.

Thank you for your assistance in this matter. Should you have any question or concerns, please do not hesitate to contact my office.

With kindest regards, I am,

Sincerely,


Robin L. Jackson

RLJ/bas
Enclosures

CC: Milt Stratos, II Esquire



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SC Court of Appeals



Post Office Box 12279
Charleston, SC 29422-2279

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