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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

Appellate Case No. 2017-001568

RECEIVED

JAN 18 2018

SC Court of Appeals

City of Myrtle Beach Appellant,

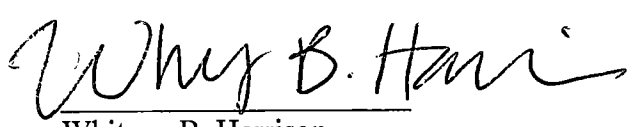
v.

Callie Barras Respondent,

MOTION FOR EXTENSION

Respondent respectfully requests a thirty (30) day extension of time to file her Initial Brief. Respondent recently retained appellate counsel in this matter. The current deadline is February 4, 2018. If granted, the new deadline for the Initial Brief would be March 6, 2018.

Respectfully submitted,



Whitney B. Harrison
McGowan, Hood & Felder, LLC
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(803) 779-0100
wharrison@mcgowanhood.com
ATTORNEY FOR RESPONDENT

January 11, 2018
Columbia, SC

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Larry B. Hyman, Jr., Circuit Court Judge

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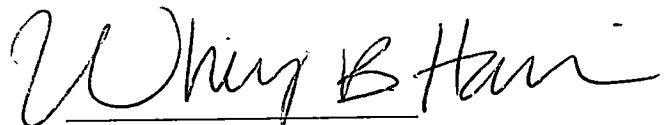
Callie Barras..... Respondent,

PROOF OF SERVICE

The undersigned hereby certifies that on January 11, 2018, she served counsel for Appellant with the *Motion for Extension and Notice of Appearance* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

Michael W. Battle
M. Kirk Battle
Battle Law Firm, LLC
P. O. Box 530
Conway, SC 29528

Respectfully submitted,



Whitney B. Harrison
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ATTORNEY FOR RESPONDENT

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Chad A. McGowan (SC,GA,NC)

S. Randall Hood

John G. Felder, Jr.

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Jordan C. Calloway

Susan F. Campbell

Deborah Casey (NC)*

Ashley White Creech

Shawn B. Deery

Chance M. Farr (SC,NC)

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Lara Pettiss Harrill

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Patrick M. Killen

Anna S. Magann

Robert V. Phillips

Ranee Saunders

James L. Ward, Jr. (SC,NC)

James Stephen Welch* (SC,OK)

Joseph G. Wright, III*

Of Counsel*

January 11, 2018

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

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SC Court of Appeals


RE: *City of Myrtle Beach v. Callie Barras*
Appellate Case No. 2017-001568

Dear Ms. Kitchings:

I am writing to notify the Court of my appearance in this matter. Due to prior professional commitments, Respondent's counsel respectfully requests a thirty (30) day extension of time to file an Initial Brief. The current deadline is February 4, 2018. If granted, the new deadline for the Initial Brief would be March 6, 2018. 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 one copy of Respondent's Motion for Extension, a self-addressed envelope, and my Notice of Appearance. 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.

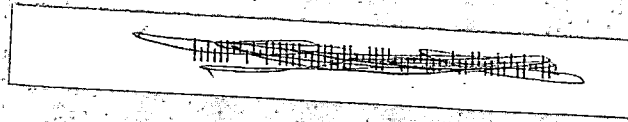
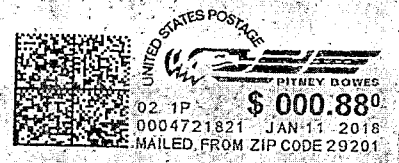
With kind regards, I am


Whitney B. Harrison

Enclosure

Cc: Mark Nappier
Michael Battle
Kirk Battle

V



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The Honorable Jenny Kitchings
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