

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,

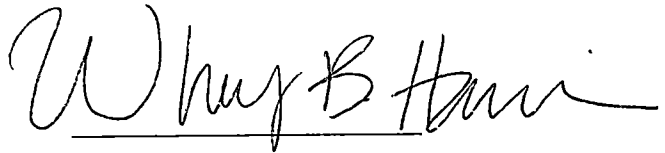
v.

Callie Barras ..... Respondent,

**NOTICE OF APPEARANCE**

Attorney Whitney B. Harrison respectfully requests this Court note her appearance as additional counsel of record for the Respondent. As the Court is aware, attorney Mark Nappier, remains counsel of record. *See* Rule 264, SCACR; *see also Ex parte Strom*, 343 S.C. 257, 539 S.E.2d 699 (2000).

January 11, 2018  
Columbia, SC



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

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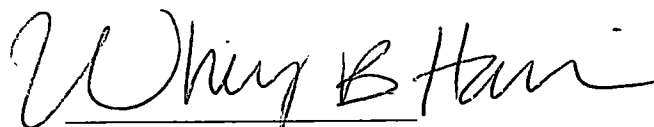
Callie Barras.....Respondent,

**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  
McGowan, Hood & Felder, LLC  
1517 Hampton Street  
Columbia, SC 29201  
(803) 779-0100  
[wharrison@mcgowanhood.com](mailto:wharrison@mcgowanhood.com)  
ATTORNEY FOR RESPONDENT

# McGowan, Hood & Felder, LLC

Chad A. McGowan (SC,GA,NC)  
S. Randall Hood  
John G. Felder, Jr.  
W. Jones Andrews, Jr.  
Jordan C. Calloway  
Susan F. Campbell  
Deborah Casey (NC)\*  
Ashley White Creech  
Shawn B. Deery  
Chance M. Farr (SC,NC)  
Eve S. Goodstein



Lara Pettiss Harrill  
Whitney B. Harrison  
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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JAN 18 2018  
SC Court of Appeals

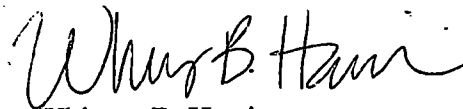
RE: *City of Myrtle Beach v. Callie Barras*  
Appellate Case No. 2017-001568

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.

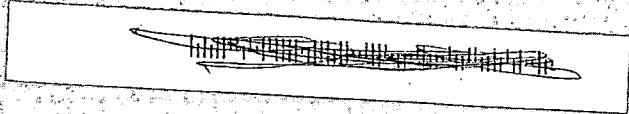
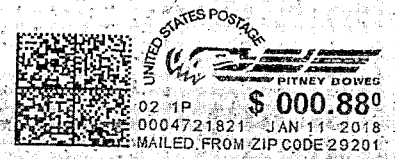
With kind regards, I am

  
Whitney B. Harrison

Enclosure

Cc: Mark Nappier  
Michael Battle  
Kirk Battle

V



MCGOWAN, HOOD & FELDER, LLC  
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The Honorable Jenny Kitchings  
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