

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas
The Honorable S. Jackson Kimball, Master-in-Equity

RECEIVED
JAN 29 2018
SC Court of Appeals

Case No.: 2017-CP-46-00867
Appellate Case No.: 2017-002024

Michael Frank, individually, and as the parent and guardian of a minor Appellant.

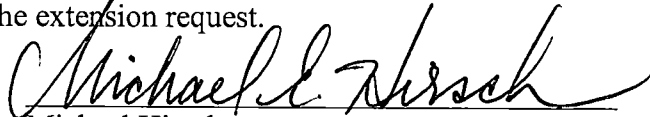
v.

South Carolina Department of Social Services Respondent.

RESPONDENTS' MOTION TO EXTEND TIME TO PREPARE AND SERVE
INITIAL BRIEF AND DESIGNATION OF MATTER

Respondent South Carolina Department of Social Services, by and through its undersigned counsel, moves for an extension of time through March 5, 2018 to prepare and serve Respondent's Initial Brief and Designation of Matter. In support of this motion, Counsel would show that he requires additional time to adequately prepare the Brief because of an extensive discovery calendar involving many other cases. Counsel certifies that prior to filing this Motion, he consulted with Cam Halford, attorney for Appellant, and that he consents to the extension request.

January 25, 2018.



Michael Hirsch
HAMILTON MARTENS, LLC
P.O. Box 10940
Rock Hill, South Carolina 29731
(803) 329-7672
ATTORNEYS FOR RESPONDENT

OTHER COUNSEL OF RECORD:

J. Cameron Halford
Halford Niemiec & Freeman, LLP
238 Rockmont Drive
Fort Mill, SC 29708
(803) 547-6618
Attorneys for Appellant

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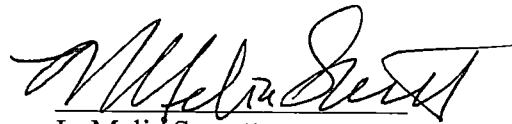
South Carolina Department of Social Services Respondent.

CERTIFICATE OF SERVICE

The undersigned, an employee of Hamilton Martens, LLC certifies that the Motion of Respondents for Extension of Time to Prepare and Serve their Initial Brief and Designation of Matter was served upon the Appellant by depositing same in the United States Mail, with sufficient postage affixed and addressed as follows:

J. Cameron Halford
Halford Niemiec & Freeman, LLP
238 Rockmont Drive
Fort Mill, SC 29708
Attorneys for Appellant

This the 25th day of January, 2018.


L. Melia Sweatt



L. Melia Sweatt
Paralegal
803-329-7702
melia.sweatt@hamiltonmartens.com

January 25, 2018

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

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SC Court of Appeals

RE: Michael Frank vs. South Carolina Department of Social Services
Appellate Case No.: 2017-002024
Our File No.: 11655-056

Dear Ms. Kitchings:

I have enclosed for filing in the above-named matter the original and seven copies of Respondent's Motion for Extension of Time to File and Serve Initial Brief and Designation of Matter, including Proof of Service. I have also enclosed a check in the amount of \$25.00 to cover the filing fee. Please return one clocked copy of the Motion to me in the envelope that I have provided.

By copy of this letter, I am forwarding a copy of the Motion to the counsel for the Appellant.

Please call me if you have any questions or concerns. Thank you for your assistance in this matter.

Sincerely,


L. Melia Sweatt
Paralegal

/lms

Enclosures

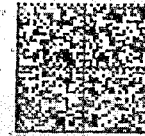
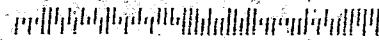
cc: J. Cameron Halford
Halford Niemiec & Freeman, LLP
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Fort Mill, SC 29708

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*Herbert W. Hamilton, Retired

✓



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