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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM SPARTANBURG COUNTY

FEB 23 2018

Court of Common Pleas

J. Durham Cole, Circuit Court Judge

SC Court of Appeals

Case No. 2017-CP-42-01468903  
Appellate Case No. 2017-002585

Cole Towing and Recovery, LLC, ..... Appellant,

v.

City of Spartanburg and Spartanburg City Council, ..... Respondents.

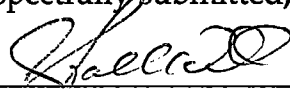
MOTION

Appellant hereby moves this Court for an extension of thirty days in which to file and serve the Appellant's Initial Brief and Designation of Matter.

Counsel is presently engaged in numerous appeals and trial level matters. In order to meet the demands of all cases and client related matters counsel has attempted to allocate time in the most efficient manner possible. Over the past thirty days numerous matters have required work on an urgent basis, and therefore, briefing in this case has been delayed. Despite diligent efforts, counsel is in need of additional time in which to serve and file the Appellant's Initial Brief and Designation of Matter in this case. Wherefore, Appellant moves for an extension of thirty days in which to file and serve the Appellant's Initial Brief and Designation of Matter.

✓

Respectfully submitted,



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J. Falkner Wilkes (SC Bar #12893)  
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(864) 282-1292  
(864) 271-6035 (facsimile)

Robert C. Childs, III, #1218  
CHILDS LAW FIRM, LLC  
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*Counsel for Appellant*

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CERTIFICATE

I certify that on February 20, 2018, I served the Appellant's Motion for an extension of time on the Respondents by placing a copy of same in the United States Mail, first class postage prepaid, addressed to counsel of record as indicated below, and to others if so indicated:

Danny C. Crowe  
Post Office Box 1149  
Columbia, South Carolina 29202

Attorney for Respondents

Also to:

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

Respectfully submitted,



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February 20, 2018.

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**Jenny Abbott Kitchings**  
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