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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

**RECEIVED**  
MAR 13 2018  
SC Court of Appeals

Appellate Case No. 2017-001568


City of Myrtle Beach .....Appellant,

v.

Callie Barras.....Respondent,

**MOTION FOR EXTENSION**

Appellant respectfully requests a thirty (30) day extension of time to file its Reply Brief. Appellant's attorneys have been retained to respond to a motion for preliminary injunction to enjoin the City of Myrtle Beach from using past police strategies and using additional police officers to keep Memorial Day weekend safe. The response will involve collecting and organizing approximately five years of police data. We requested an extension to respond to the preliminary injunction. Due to fact that the upcoming Memorial Day weekend is fast approaching, our response to the preliminary injunction is due on March 28, 2018. We have contacted opposing counsel in the appeal and they do not object to our request for an extension. The current deadline is March 17, 2018. If granted, the new deadline for the Reply Brief would be April 16, 2018.

  
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Attorneys for Appellant

March 9, 2018

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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Larry B. Hyman, Jr., Circuit Court Judge

Appellate Case No. 2017-001568

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City of Myrtle Beach .....Appellant,

V.


Callie Barras.....Respondent,

**PROOF OF SERVICE**

The undersigned hereby certifies that on March 9, 2018 he served counsel for Respondent with the *Motion for Extension* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

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March 9, 2018

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March 9, 2018

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 116929  
Columbia, SC 29211

**RECEIVED**  
MAR 13 2018  
SC Court of Appeals

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


Dear Ms. Kitchings:

Enclosed please find Appellant's Motion for Extension. I am requesting an additional 30 day extension of time for filing Reply Brief in the above referenced action. I believe that an extension would automatically extend the time for filing Final Briefs and the Record on Appeal. I have consulted with opposing counsel and they have agreed to our extension request.

Enclosed is our check in the amount of \$25.00 to cover the Court's cost.

By copy of this letter I am formally opposing counsel of my request.

Sincerely,

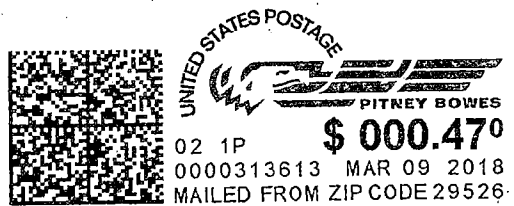
  
Michael W. Battle

C: Mark Nappier, Whitney B. Harrison and Tom Ellenburg  
Enclosure: stated

✓

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
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