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IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Case No. 2017-002585

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MAR 26 2018

SC Court of Appeals

Cole Towing and Recovery, LLC,

Appellant,

v.

City of Spartanburg and Spartanburg
City Council,

Respondents.

RESPONDENTS' MOTION FOR AN EXTENSION


Respondents, City of Spartanburg and Spartanburg City Council, hereby move the Court for a thirty (30) day extension of the deadline in which to file the Initial Brief of Respondents and Designation of Matter to be included in the Record on Appeal.

The Initial Brief of Respondents is currently due on April 6, 2018. This is Respondents' first request for an extension. The extension is being requested to permit sufficient time for its completion due to complexity of issues presented by this case. Attorneys for Respondents have conferred with counsel for Appellant, and he has consented to the request for an extension of time.

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Respectfully submitted,

March 22, 2018



Danny C. Crowe
Mary D. LaFave
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Attorneys for Respondents

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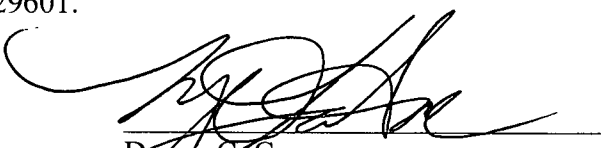
City of Spartanburg and Spartanburg
City Council,

Respondents.

PROOF OF SERVICE

I certify that I have served the Respondents' Motion for an Extension on Cole Towing and Recovery, LLC, by causing a copy of it to be deposited in the United States Mail, postage prepaid, on March 22, 2018, addressed to its attorneys, Robert C. Childs, III, Esquire, 2100 Poinsett Highway, Suite D, Greenville, South Carolina 29609, and J. Falkner Wilkes, Esquire, 114 Whitsett Street, Greenville, South Carolina 29601.

March 22, 2018

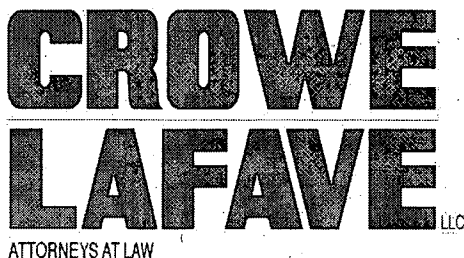


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SC Court of Appeals

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

Re: **Cole Towing and Recovery, LLC v. City of Spartanburg and Spartanburg City Council**
Appellate Case No. 2017-002585

Dear Ms. Kitchings:

Please find enclosed for filing an original and six copies of Respondents' Motion for an Extension and Proof of Service relative to the above-captioned matter. Also enclosed is a check in the amount of \$25.00 representing the filing fee.

Once filing is complete, please return the clocked copy to us in the enclosed self-addressed, stamped envelope. By copy of this correspondence to the attorneys for the Appellant, I am hereby serving a copy of this Motion on Mr. Childs and Mr. Wilkes.

Sincerely yours,

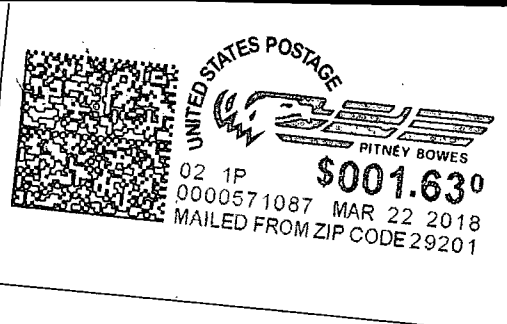
A handwritten signature in black ink, appearing to be "D.C. Crowe".

Danny C. Crowe
Mary D. LaFave

DCC/dmb
Enclosures

cc: Robert C. Childs, III, Esquire
J. Falkner Wilkes, Esquire
Client (via e-mail only)

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Columbia, SC 29202

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