

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM WILLIAMSBURG COUNTY

Court of Common Pleas

Clifton Newman, Circuit Court Judge

**RECEIVED**

MAY 16 2018

SC Court of Appeals

Appellant Case No: 2017-001077

April Grant, as Personal  
Representative of the Estate of  
Barrett Demetric Jeremiah Mack,

Respondent,

v.

Necole Binyard, as Personal  
Representative of the Estate of  
Harry Rufus Emanuel Washington,

Appellant.

MOTION FOR EXTENSION OF TIME  
TO FILE RECORD ON APPEAL

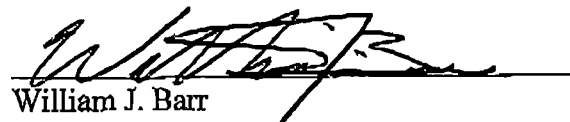
Pursuant to S.C. Appellate Court Rule 263(b), Appellant respectfully moves for a thirty (30) day extension of time, to and including, July 18, 2018, in which to file the Record on Appeal. Appellant's Record on Appeal is currently due on or about May 18, 2018. Appellant believes good cause exist(s) for the requested extension, as set forth in detail below:

Counsel for Appellant lost all staffing approximately two weeks ago without any notice from any of the same. Counsel has now employed an independent contractor to deal with the work left behind by the former staffers. A thirty (30) day extension for submission of Appellant's Record on Appeal should hopefully enable counsel to submit the Record on Appeal. Further, upon information and belief, no significant delay of this matter would harm the Respondent.

For these reasons, Appellant respectfully requests that this motion be granted and Appellant be allowed until and including July 18, 2018 in which to file the Record on Appeal.

Dated: May 16, 2018

Barr Law LLC



William J. Barr  
108 N. Academy Street  
Kingstree, SC 29556  
(843)355-5444  
Attorney for Appellant

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PROOF OF SERVICE

I certify that I have served the MOTION FOR EXTENSION OF TIME TO FILE  
APPELLANT'S RECORD ON APPEAL by depositing a copy of it in the United States Mail,  
postage prepaid, on May 16, 2018, addressed to the following attorneys of record:

Charles R. Norris, Esquire  
Nelson Mullins Riley & Scarborough LLP  
151 Meeting Street, 6<sup>th</sup> Floor  
Charleston, SC 29401-2239  
Attorney for State Farm

G. Murrell Smith, Jr.  
Lee, Erter, Wilson, Holler & Smith, L.L.C.  
P.O. Box 580  
Sumter, SC 29141  
Attorney for April Grant Mack

Kimberly Barr, Esquire  
108 W. Main Street  
Kingstree, SC 29556  
(843)355-5349  
Attorney for April Grant Mack

Ronnie A. Sabb, Esquire  
108 W Main Street  
Kingstree, SC 29556  
Attorney for April Grant Mack

Jonathan M. Robinson, Esquire  
935 Broad Street  
Camden, SC 29020  
Attorney for State Farm Automobile Mutual Insurance

Ashley B. Nance, Esquire  
King, Love, Hupfer & Nance  
PO Box 1764  
Florence, SC 29503  
Attorney for GEICO Insurance Company

May 16, 2018



Marcia Hall  
Legal Assistant  
Barr Law  
108 N. Academy Street  
Kingstree, SC 29556  
843-355-5444  
Attorney for Appellant

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MAY 16 2018

SC Court of Appeals

May 16, 2018

Jenny Abbott Kitchings  
Clerk of the Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

VIA Fax /US Mail  
(803)734-1839

**Re: April Grant, as Personal Representative of the Estate of Barrett Demetric Jeremiah Mack, Respondent, v. Necole Binyard, Appellant**  
**Appellant Case No: 2017-001077**

Dear Ms. Kitchings:

Enclosed please find original and six (6) copies of the Motion for Extension of Time to File Record on Appeal, along with attached Proof of Service for filing. Please return one filed copy of the Motion and the Proof to my office in the enclosed self-addressed stamped envelope. Also, enclosed is check # 7669 in the amount of \$25 as fee for the same.

Further, by copy of this letter, all attorneys of record are being served with these documents.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact our offices.

Sincerely,

William J. Barr, Esquire

WJB/mh

Enclosures as stated

CC:

Charles R. Norris, Esquire

G. Murrell Smith, Jr.

Kimberly Barr, Esquire

Ronnie A. Sabb, Esquire

Jonathan M. Robinson, Esquire

Ashley B. Nance, Esquire



**Barr Law LLC**  
 William J. Barr  
 Attorney At Law  
 108 North Academy Street  
 Kingstree, South Carolina 29556  
 Telephone: (843) 355-5444 or 355-5445  
 Fax: (843) 355-5194  
 E-mail: barrlaw@ftc-i.net

May 16, 2018

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 Clerk of the Court  
 South Carolina Court of Appeals  
 Post Office Box 11629  
 Columbia, South Carolina 29211

VIA Fax /US Mail  
 (803)734-1839

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William J. Barr, Esquire

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 Ronnie A. Sabb, Esquire  
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 Ashley B. Nance, Esquire

**The Barr Law Firm**  
William J. Barr  
Attorney At Law  
108 North Academy Street  
Kingstree, South Carolina 29556  
Telephone (843) 355-5444  
Fax (843) 355-5194

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MAY 16 2018  
SC Court of Appeals

<b>COMPANY NAME:</b> South Carolina Court of Appeals	<b>FROM:</b> <b>THE BARR LAW FIRM</b>
<b>ATTENTION:</b> Jenny Kitchings	<b>DATE:</b> May 102018
<b>FAX NUMBER:</b> 803-734-1839	<b>PHONE NUMBER:</b> 803-734-1890

Urgent  Reply  Please Comment  Please Review  For Your Information  
Total Pages Including Fax Cover Sheet: 7

RE: Motion for Extension of Time to File Record on Appeal  
Appellant Case No.: 2017-001077

Comments: Ms. Kitchings,

Please see copy of Motion for Extension of Time to File Record on Appeal in connection with above reference. We shall forward originals and six (6) copies for filing in the mail.

I just want to want to give you a heads-up by faxing the same. Please let us know if there is anything else required.

**THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE MAY BE PRIVILEGED AND CONFIDENTIAL. IT IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE UNITED STATES POSTAL SERVICE.**

TRANSMITTED BY: WJB/mh  
DATED: May 16, 2018

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