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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 21 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

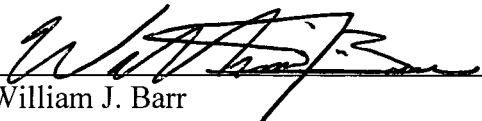
Pursuant to S.C. Appellate Court Rule 263(b), Appellant respectfully moves for a thirty (30) day extension of time, to and including, July 18, 2018, in which to file the Record on Appeal. Appellant's Record on Appeal is currently due on or about May 18, 2018. Appellant believes good cause exist(s) for 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, 6th 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

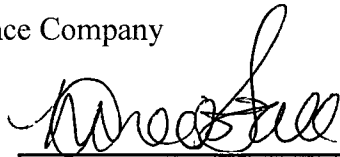
Kimberly Barr, Esquire
108 W. Main Street
Kingstree, SC 29556
(843)355-5349
Attorney for April Grant Mack

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

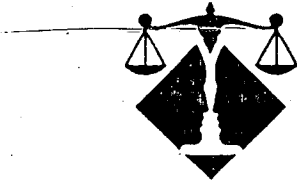
Jonathan M. Robinson, Esquire
935 Broad Street
Camden, SC 29020
Attorney for State Farm Automobile Mutual Insurance

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

May 16, 2018



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



Barr Law LLC
William J. Barr
Attorney At Law
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E-mail: barrlaw@ftc-i.net



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

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