

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge
Jocelyn Newman, Circuit Court Judge

Case No. 2018-000948

Modesta Brinkman, David
Brinkman, James Coleman,
Carl Foster, Karen Foster,
Robert Collins, Pamela
Collins,

Appellants,

v.

Weston & Sampson
Engineers, Inc. City of
Columbia, South Carolina,
North American Pipeline
Management and Layne
Inliner,

Respondents.

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DEC 10 2018

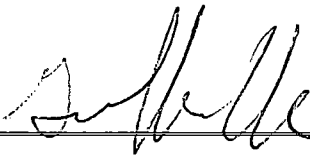
SC Court of Appeals

MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY BRIEF

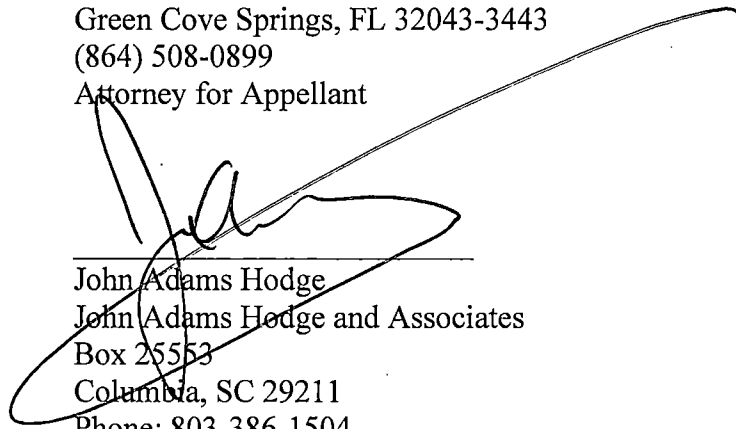
Modesta Brinkman, David Brinkman, Robert Collins, Jay Coleman, Karen Foster and Carl Foster respectfully move this Honorable Court for an enlargement of time until December 21, 2018 to prepare and file a Reply Brief. The reason for the extension is due to ensure timely response to nearly identical briefs filed and served at different times by Respondents. The City of Columbia filed a brief and motion for extension of time on the 26th of November, 2018. Respondent Layne Inliner's service of its brief was postmarked on the 6th of December with a Certificate of Service on December 5th.

The brief was received on December 10, 2018 and we ask for 10 days from the date of receipt to respond to all briefs. The Appellants believe that the delay would have minimal impact to the proceedings as the Court has not yet set this matter for a hearing and neither the Appellants nor the Respondents will suffer any prejudice by the brief delay. In addition, granting this motion would restore clarity and consistency in scheduling and deadlines for all parties to this appeal.

We have contacted Counsel for the City of Columbia and North American Pipeline Management, and Layne Inliner and requested their consent. There has been no objection to this request for extension. Respectfully submitted.



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December 10, 2018
Columbia, SC

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AFFIDAVIT OF SERVICE

A copy of this Motion for Enlargement of Time and Acceptance of a Late Filed Brief was served on Counsel for Respondents on December 10, 2018 by placing a copy in the US mail and mailed to the following address:

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December 10, 2018
Columbia, SC

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December 10, 2018

Jenny Abbott Kitchings
Clerk of Court
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SC Court of Appeals

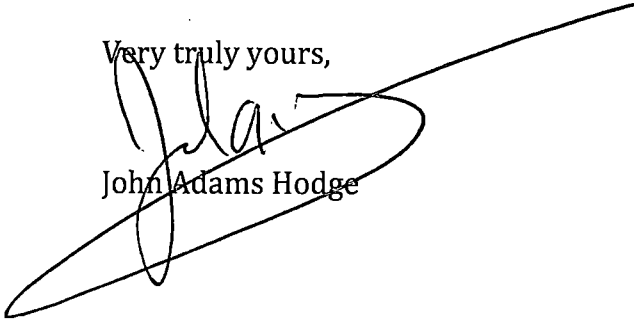
Re: Brinkman v. City of Columbia, et al.; Appellate Case Number 2018-0000948;
Motion for Extension of Time

Dear Ms. Kitchings:

Enclosed for filing, please find an original and two copies of the Appellants' Motion For Enlargement of Time to File a Reply Brief. Please return the clocked copies to me via our courier. We have enclosed a \$50 filing fee.

Please let me know if there is any additional information that you need. Thank you very much for your assistance.

Very truly yours,


John Adams Hodge

cc: Counsel of Record

Opposing counsel have
consented to this motion.
Consent was obtained after
this letter was prepared. - JAH

J