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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Hon. Alison Renee Lee, Circuit Court Judge

Case No. 2016-CP-10-2230

RECEIVED
DEC 28 2018
SC Court of Appeals

The Housing Authority of the City of
Charleston,

Respondent,

v.

Katrina Brown,

Appellant.

MOTION FOR EXTENSION OF TIME

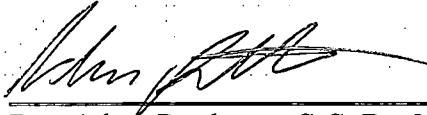
Appellant hereby requests a 30-day extension of time to file her initial brief. Appellant received written notice of entry of the order from which this appeal is taken on November 8, 2018 and timely filed and served her Notice of Appeal on December 5, 2018. The timing of this appeal and the intervening holidays will prevent Appellant from adequately presenting the issues on appeal which Appellant believes are important not only to her, but to numerous others who face similar situations. Appellant has consulted with opposing counsel and has been advised that Respondent consents to the requested extension.

THEREFORE, Appellant respectfully requests that a 30-day extension of time to file her initial brief be granted and that her initial brief be due on or before February 7, 2019

WE SO MOVE:

December 28, 2018

SOUTH CAROLINA APPLESEED
LEGAL JUSTICE CENTER



By: Adam Protheroe, S.C. Bar No. 78442
P.O. Box 7187
Columbia, SC 29202
(803) 779-1113 ext. 106

SOUTH CAROLINA LEGAL SERVICES
Matthew M. Billingsley, S.C. Bar No. 76095
2803 Carner Avenue
Charleston, SC 29405
(843) 266-2174

Attorneys for Appellant

Other Counsel of Record:
Theodore Parker, III, Esq.
Parker Nelson & Associates, CHTD.
211 King Street, Suite 107
Charleston, SC 29401

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CERTIFICATE OF SERVICE

I certify that I have served the Notice of Appeal on the Housing Authority of the City of Charleston by depositing a copy of it in the United States Mail, postage prepaid, on December 28, 2018, addressed to its attorney of record, Theodore Parker, III, Esq. Parker Nelson & Associates, CHTD. 211 King Street, Suite 107 Charleston, SC 29401.

SOUTH CAROLINA APPLESEED LEGAL
JUSTICE CENTER

December 28, 2018


By: Adam Protheroe, S.C. Bar No. 78442
P.O. Box 7187
Columbia, SC 29202
(803) 779-1113 ext. 106

December 28, 2018

Via Hand Delivery

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

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SC Court of Appeals

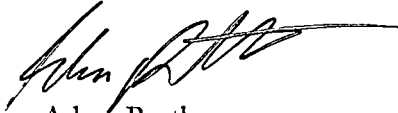
**RE: The Housing Authority of the City of Charleston v. Katrina Brown
Appellate Case No. 2018-002155**

Dear Ms. Kitchings:

Please find enclosed for filing the original and six copies of Appellant's Motion for Extension of Time along with the \$50.00 filing fee.

With kind regards, I am

Sincerely,



Adam Protheroe
Matthew M. Billingsley
Attorneys for Appellant

AP/

CC: Theodore Parker, III
Parker Nelson & Associates, CHTD.
2011 King Street, Suite 107
Charleston, SC 29401

✓