

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED
JUL 08 2019
SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Thomas A. Russo, Circuit Court Judge

CASE NO. 2014-CP-26-7790

Richard Ciampanella Respondent

vs.

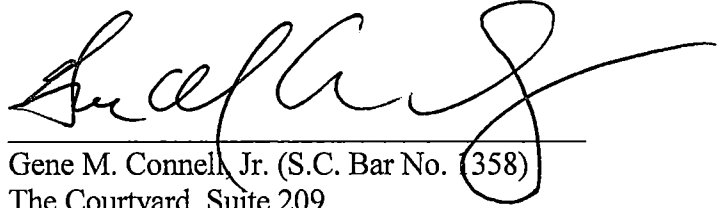
City of Myrtle Beach Appellant

RESPONDENT’S MOTION FOR EXTENSION OF TIME
TO FILE RETURN TO APPELLANT’S MOTION TO STRIKE

You will please take notice that the undersigned, as attorney for the Respondent, moves this Court for an Order extending the time to file Respondent’s Return to Appellant’s Motion to Strike and Hold Deadlines in Abeyance in the captioned case. Appellant’s Motion was filed June 27, 2019 and received by Respondent on July 1, 2019. The basis of this request is that the undersigned underwent emergency eye surgery on June 20, 2019 and continues to be under the care of his eye surgeon and work restrictions at this time.

WHEREFORE, the undersigned respectfully requests an extension until August 8, 2019 to file Respondent’s Return to Appellant’s Motion to Strike and Hold Deadlines in Abeyance

KELAHER, CONNELL & CONNOR, P.C.



Gene M. Connell, Jr. (S.C. Bar No. 358)
The Courtyard, Suite 209
1500 U. S. Highway 17 North
Post Office Drawer 14547
Surfside Beach, South Carolina 29587-4547
(843) 238-5648 (phone)
(843) 238-5050 (facsimile)
gconnell@classactlaw.net

July 3, 2019

Attorneys for Respondent

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Thomas A. Russo, Circuit Court Judge

CASE NO. 2014-CP-26-7790

RECEIVED
JUL 08 2019
SC Court of Appeals

Richard Ciampanella Respondent

vs.

City of Myrtle Beach Appellant

PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of Respondent's Motion for Extension of Time to File Return on the 3rd day of July 2019, by depositing a copy of same in the United States Mail, postage prepaid, to:

Amy L. Neuschafer, Esquire
Fred H. Oliver, Esquire
COLLINS & LACY, P.C.
11945 Grandhaven Drive, Suite D
Murrells Inlet, SC 29576

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 3rd day of July, 2019.

Anna H. Hand
Notary Public for South Carolina
My Commission Expires: 3-28-26

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
GENE M. CONNELL, JR.
L. SIDNEY CONNOR, IV
LISA POE DAVIS

* OF COUNSEL

AREA CODE 843

238-5648

FAX: 238-5050

July 3, 2019

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

RECEIVED

JUL 08 2019

SC Court of Appeals

Re: Appellate Case No. 2018-002270
Richard Ciampanella v. City of Myrtle Beach
C/A No. 2014-CP-26-7790
Our File No. 2014-0324C

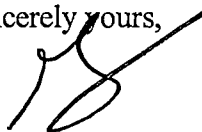
Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Respondent's Motion for Extension of Time to File Return and Proof of Service in the above-captioned case. I also enclose a check for \$50.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr.:sm
Enclosures

cc w/enc.: Amy L. Neuschafer, Esquire
Fred H. Oliver, Esquire
Julian Z. Hanna, Esquire



KELAHER, CONNELL & CONNOR, P.C.
ATTORNEYS AT LAW
P. O. DRAWER 14547
SURFSIDE BEACH, SOUTH CAROLINA 29587

RECEIVED
JUL 08 2019
SC Court of Appeals

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

