

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Thomas A. Russo, Circuit Court Judge

Appellate Case No. 2018-002270  
Case No. 2014-CP-26-07790

Richard Ciampanella, .....Respondent,

v.

City of Myrtle Beach, .....Appellant.

**APPELLANT’S MOTION FOR EXTENSION**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules (SCACR), Appellant City of Myrtle Beach respectfully requests a 20 day extension of the deadline for serving the Initial Reply Brief of Appellant due to Appellant counsel being out-of-state due to a family medical emergency. Counsel for Respondent has advised that he consents to this request. The current deadline is October 3, 2019. With an extension, the deadline for service of the Initial Reply Brief of Appellant will be October 23, 2019.

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**RECEIVED**  
SEP 24 2019  
SC Court of Appeals

Respectfully submitted,  
COLLINS & LACY, P.C.

By:   
 Amy L. Neuschafer, Esquire  
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ATTORNEYS FOR APPELLANT  
CITY OF MYRTLE BEACH

**APPELLANT'S MOTION FOR EXTENSION**

Murrells Inlet, South Carolina  
September 24, 2019

Other Counsel of Record:

Gene M. Connell, Jr., Esquire  
Kelaher, Connell & Connor, P.C.  
Post Office Drawer 14547  
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Thomas A. Russo, Circuit Court Judge

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Richard Ciampanella, .....Respondent,

v.

City of Myrtle Beach, .....Appellant.

**PROOF OF SERVICE**

I certify that I have served Appellant's Motion for Extension by mailing a copy of same to Respondent's attorneys of record in the United States mail, with sufficient postage affixed thereto on the date indicated below.

**COUNSEL SERVED:**

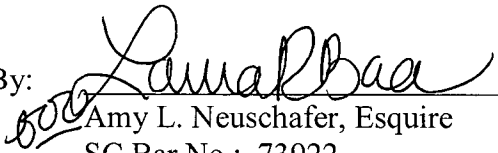
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SC Court of Appeals

[SIGNATURE PAGE TO FOLLOW]

COLLINS & LACY, P.C.

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ATTORNEYS FOR APPELLANT  
CITY OF MYRTLE BEACH

**PROOF OF SERVICE**

Murrells Inlet, South Carolina  
September 24, 2019



Amy L. Neuschafer | D: 843.353.2331 | E: aneuschafer@collinsandlacy.com

September 24, 2019

**VIA HAND DELIVERY**

The Honorable Jenny A. Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
**SEP 24 2019**  
**SC Court of Appeals**

Re: Richard Ciampanella v. City of Myrtle Beach  
Civil Action No. 2014-CP-26-7790  
C&L File No. 000456-01017

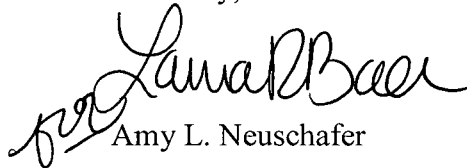
Dear Ms. Kitchings:

Enclosed for filing is the original and six (6) copies of Appellant's Motion for Extension together with Proof of Service. Also included is a check for the filing fee in the amount of \$50.00. Please return a filed copy to me in the self-addressed stamped envelope provided.

If you have any questions or need additional information, please do not hesitate to contact me.

With kind regards,

Sincerely,

  
Amy L. Neuschafer

/acg  
Enclosures

cc: Gene M. Connell, Jr., Esquire  
Julian Z. Hanna, Esquire



1330 Lady Street, Sixth Floor (29201) Post Office Box 12487 | Columbia, SC 29211

The Honorable Jenny A. Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

456-1017

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