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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Mark Hayes, Circuit Court Judge

Appellate Case No. 2018-002223

H. Hughes Andrews.....Respondent,

v.

Quentin Broom, Jr.....Appellant,

MOTION FOR EXTENSION

Appellant’s counsel respectfully requests a third thirty-day extension of time to file the Initial Brief in this matter. Counsel recognizes that the Court has previously stated that a further extension would only be granted for extraordinary circumstances. However, counsel respectfully submits that exceptional circumstances exist based on the following facts. This case involves a court record spanning 14 years, from 2005 through 2019. The issues on appeal involve events that occurred throughout the course of this case. Appellant’s counsel, Whitney B. Harrison, has had three appellate oral arguments before this Court in the past month and, thus, been unable to assist in preparing appellant’s opening brief. Ms. Harrison is the most familiar with the prior appeals and trial. The undersigned also participated in the trial and had a Supreme Court argument in the month of October that precluded extensive involvement in preparing this appeal. While, in our absence, co-counsel has devoted substantial time to preparing the opening brief, however, he is

new to the case, has no first-hand knowledge of the trial court record, and has also been required to prepare for and participate in several unexpected matters in the last month.

For all of these reasons, counsel has been unable to finalize the initial brief. However, counsel has made progress in preparing the brief and record and believes one additional 30-day extension would provide the needed time to prepare and file the opening brief. For these reasons, Appellant respectfully requests an additional thirty days to file the opening brief in this matter, from November 20, 2019 to December 20, 2019.

November 19, 2019
Columbia, SC

Respectfully submitted,



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ATTORNEYS FOR APPELLANT

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PROOF OF SERVICE

The undersigned hereby certifies that on November 19, 2019, he served counsel for Respondent with the third *Motion for Extension* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following address:

Rodney Pillsbury
301 Rutherford Street
Greenville, SC 29609

Respectfully submitted,



Matthew T. Richardson

W Y C H E

Attorneys at Law

November 19, 2019

Via Hand Delivery

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

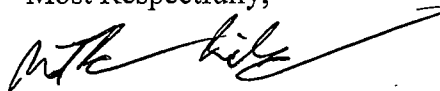
RE: *Broom v. Andrews*
Appellate Case No. 2018-002223

Dear Ms. Kitchings,

I am writing to request another thirty-day extension for filing the Appellant's Initial Brief. This request is made based on the unusual circumstances of the underlying record and the obligations of counsel, as detailed in the motion. Currently, the deadline is November 20, 2019. If granted, the new deadline for the Initial Brief would be December 20, 2019. I respectfully ask that all filing deadlines be held in abeyance pending a decision on this request for an extension.

Please find the original and two copies of Appellant's Motion for Extension. I would ask for the return of a clocked copy of the Motion. I am also enclosing a check from our firm in the amount of \$50.00 to cover the filing fee for this motion. If you have any questions or concerns, please do not hesitate to contact me.

Most Respectfully,



Matthew T. Richardson

cc:

Rodney Pillsbury
James E. Cox, Jr.
Whitney B. Harrison

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