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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

The Honorable Donald B. Hocker, Circuit Court Judge

Appellate Case Number: 2019-001514

RECEIVED
FEB 06 2020
SC Court of Appeals

Martha Foster Watts, Appellant,

v.

Ricky W. Chastain, Sheriff
Laurens County, South Carolina, Respondent.

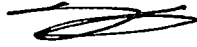
APPELLANT'S MOTION FOR EXTRA TIME TO FILE INITIAL BRIEF

Appellant, by counsel, moves the Court for extra time to file her Initial Brief as follows:

1. Appellant's Initial Brief is due to be filed February 7, 2020.
2. Appellant requires an additional thirty days to properly prepare her brief due to the complexity of the issues on appeal and due to undersigned counsel's litigation schedule and other demands of his law practice.
3. No prior extension of time to file the brief has been granted by the court.
4. No party will be prejudiced in any way by granting this extension of time.
5. Undersigned has received consent of opposing counsel, for the requested extension.
6. This request is made in good faith and for no improper purposes.

WHEREFORE, Appellant moves the Court for an extension of time to file her Initial Brief, through March 9, 2020.

Respectfully submitted this 4th day of February 2020.



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Attorney for Appellant

Other Counsel of Record:

Russell W. Harter, Jr.
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Counsel for the Appellant

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PROOF OF SERVICE

I certify that I have served the Appellant's Request for an Extension of Time to file and serve her Initial Brief and Designation of matter to be included in the Record on Appeal on Ricky W. Chastain by depositing a copy of it in the United States Mail, postage prepaid, on February 4, 2020, addressed to the attorneys of record, Russell W. Harter, Jr., Chapman, Harter & Harter, Post Office Box 10224, Greenville, South Carolina 29603 and A. Cruickshanks, IV., Post Office Box 786, Clinton, South Carolina 29325.

Dated: February 4, 2020



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February 4, 2020

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

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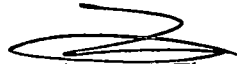
RE: **Martha Foster Watts v. Ricky W. Chastain, Sheriff Laurens County, South Carolina**
2019-001514

Dear Ms. Kitchings:

Enclosed for filing is Appellant's motion for request for an extension of time and a filing fee of \$50.00.

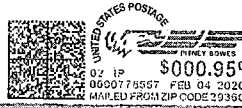
I have also enclosed proof of service and an original and six (6) copies of each of the motion.

Sincerely,



Thomas J. Thompson
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Attorney for the Appellant

TJT/cav



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