

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Robin B. Stilwell, Circuit Judge

Appellate Case No. 2019-001449

RECEIVED
FEB 25 2020
SC Court of Appeals

Sylvia Lockaby,.....Appellant,

v.

City of Simpsonville, Janice Curtis, and Adam Randolph,.....Respondents.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE APPELLANT'S
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN
RECORD ON APPEAL

Andrew S. Radeker
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Attorneys for Appellant

Appellant hereby moves pursuant to Rule 263(b), SCACR, for an extension of the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal. Specifically, Appellant seeks an extension of that time to 30 days from the date that Appellant's brief is presently due of March 2, 2020. If the request is granted, Appellant's initial brief and designation of matter to be included in the record on appeal will be due on April 1, 2020. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. Counsel was initially unaware his office had received the transcript of this matter until Appellant's filing last week and the press of work on other cases, including several writing deadlines, will prevent counsel from completing the reply before the current March 2, 2020 deadline.
2. The Respondent consents to the requested extension.
3. Appellant has not sought previous extension in this appeal.
4. There is good cause to grant the requested extension.

WHEREFORE Appellant prays for an order extending the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal by 30 days, to April 1, 2020.

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Respectfully submitted,

Taylor Smith

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CERTIFICATE OF SERVICE

I certify that I have caused the attached extension of the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal to be filed and served via U.S. Mail on Respondents at the address noted below.

February 25, 2020

Respectfully submitted,



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[Respondent address appears next page]

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