

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas  
Alexander S. Macaulay, Circuit Court Judge

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2009-CP-04-01693

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Michael Cunningham, ..... Appellant,

v.

Anderson County, ..... Respondent.

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**MOTION FOR EXTENSION**

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Pursuant to Rule 240, SCACR, Appellant Michael Cunningham requests a 15-day extension of the deadline for filing the Petition for Rehearing. The current deadline is March 14, 2013. This is the first request for an extension of this deadline.

Respectfully submitted,



John S. Nichols  
SC Bar No. 4210  
BLUESTEIN, NICHOLS, THOMPSON &  
DELGADO, LLC  
Post Office Box 7965  
Columbia, South Carolina 29202  
(803) 779-7599

March 13, 2013

THE STATE OF SOUTH CAROLINA  
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676057

APPEAL FROM ANDERSON COUNTY  
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Alexander S. Macaulay, Circuit Court Judge

2009-CP-04-01693

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v.

Anderson County, ..... Respondent.

**PROOF OF SERVICE**

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondent with a copy of the *Motion for Extension* by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

William W. Wilkins, Esquire  
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*Erin Bridges*

Erin Bridges  
BLUESTEIN, NICHOLS, THOMPSON  
& DELGADO, LLC

March 13, 2013  
Columbia, South Carolina



Margaret Miles Bluestein  
John Shannon Nichols  
Stacy Elizabeth Thompson  
John Dennis Delgado  
Allison Paige Sullivan  
Ashley Trout Thompson  
Blake Alexander Hewitt

OF COUNSEL  
O Eugene Powell, Jr.  
Rebecca Cagle Patrick

March 13, 2013

**VIA HAND DELIVERY**

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

RE: Michael Cunningham v. Anderson County  
Case Tracking No: 2011-194209

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in regards to the above referenced case. I have also enclosed a proof of service of this document on counsel for the Respondent and a check in the amount of \$25.00 for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges  
Paralegal to John S. Nichols  
BLUESTEIN, NICHOLS, THOMPSON &  
DELGADO, LLC

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Enclosures

cc: Brian P. Murphy, Esquire  
William W. Wilkins, Esquire  
Kirsten E. Small, Esquire  
Tanya A. Gee, Esquire