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**Sep 21 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Erin D. Dean, Special Referee

Case No.: 2019-CP-07-00818  
Appellate Case No. 2021-00321

Mare Baracco..... Appellant-Respondent,

v.

Beaufort County..... Respondent-Appellant.

**MOTION FOR 30-DAY EXTENSION BY RESPONDENT-APPELLANT  
BEAUFORT COUNTY**

The Respondent-Appellant moves for a thirty (30) day extension to file its initial brief and designation of contents of record on appeal due to Respondent-Appellant counsel's heavy workload and recent illness.

September 21, 2021



E. Richardson LaBruce, S.C. Bar No. 80106  
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*Attorney(s) for Respondent-Appellant*

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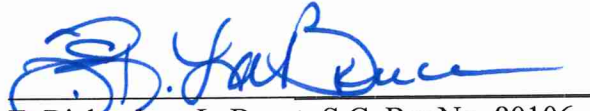
**Sep 21 2021**

**SC Court of Appeals**

**CERTIFICATE OF COUNSEL**

I certify that prior to filing this motion, I consulted with opposing counsel who does not object to the relief requested.

September 21, 2021

  
E. Richardson LaBruce, S.C. Bar No. 80106

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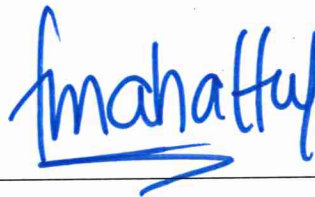
SC Court of Appeals

CERTIFICATE OF SERVICE

This is to certify that I, Fabianna Mahaffey, Legal Assistant to E. Richardson LaBruce, Esquire, attorney for Respondent-Appellant, have this day mailed a true and accurate copy of the within and foregoing MOTION FOR 30-DAY EXTENSION BY RESPONDENT-APPELLANT BEAUFORT COUNTY upon counsel of record by mailing the same via Certified USPS Mail Delivery to:

S.C. Court of Appeals  
The Honorable Jenny A. Kitchings  
Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211

FINGER, MELNICK & BROOKS & LaBRUCE, P.A.



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Fabianna Mahaffey  
P.O. Box 24005  
Hilton Head Island, SC 29925

September 21, 2021

**FINGER, MELNICK, BROOKS & LaBRUCE, P.A.**  
ATTORNEYS AT LAW

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◻ Court Certified Mediator  
▪ Court Certified Arbitrator / Mediator

September 21, 2021

*Via Priority USPS Mail and Email – [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)*

THE HONORABLE JENNY A. KITCHINGS  
CLERK OF COURT  
S.C. Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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Re: **Mare Baracco v. Beaufort County; Appellate Court Case No. 2021-000321**

Dear Ms. Kitchings,

Beaufort County is the Respondent-Appellant in the above referenced action. The Respondent-Appellant's *Initial Brief* is due on Wednesday September 22, 2021. I am requesting a (30) day extension due to counsel's heavy workload and illness.

Enclosed please find our firm's check in the amount of \$50.00 to cover the cost of the request. Thank you in advance for your attention to this matter.

Sincerely,



E. RICHARDSON LABRUCE  
FINGER, MELNICK, BROOKS & LABRUCE  
*Attorney for the Respondent-Appellant*

FM/

Enclosure: Motion for Extension; Check No. 40408

Cc: Thomas R. Goldstein, Esq. (with enclosure)