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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

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SC Court of Appeals

Mare Baracco..... Appellant-Respondent,

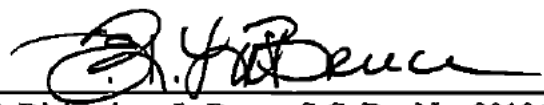
v.

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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Hilton Head Island, SC 29925-4005
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Email: erlabruce@fingerlaw.com
Attorney(s) for Respondent-Appellant

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

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

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SC Court of Appeals

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



Fabianna Mahaffey
P.O. Box 24005
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September 21, 2021

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Also admitted in:
* Georgia
† New York

◊ Court Certified Mediator
* Court Certified Arbitrator / Mediator

September 21, 2021

Via Priority USPS Mail and Email – 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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SEP 28 2021
SC Court of Appeals

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)

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