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July 28, 2022

Sent Via Email (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
1220 Senate Street, Columbia, SC 29201
Columbia, SC 29211

RECEIVED
Jul 28 2022
SC Court of Appeals

Re: Michael K. Crowley v. Darlington County
Appellate Case No. 2022-000282

Dear the Honorable Ms. Kitchings:

Please allow this letter to serve as a request for clarification of the current deadlines for filings in the above captioned case. Appellant filed their Initial Brief with this Court on June 28, 2022, which would have produced a July 28, 2022, deadline for Respondents to file their Initial Brief. On June 30, 2022, this Court sent Appellant a deficiency letter, stating that Appellant must correct two (2) deficiencies within ten (10) days, or their appeal would be dismissed. The deficiencies referenced in the June 30, 2022, letter included Appellant's Initial Brief exceeding the required page limit set forth in Rule 208(b)(5), SCACR, and Appellant's Initial Brief containing a document that does not comply with Rule 208, SCACR.

Thereafter, Appellant filed a "Motion to Exceed Page Limit" on July 5, 2022, and Respondents timely filed a return to Appellant's aforementioned Motion on July 11, 2022. Appellant's Motion did not address the second deficiency referenced in this Court's June 30, 2022, letter—the document not in compliance with Rule 208, SCACR. To date, this Court has not ruled on Appellant's "Motion to Exceed page Limit."

At this time, Respondents respectfully request clarification from this Court regarding Respondents' deadlines in this case. By the very nature of being Respondents in this claim, my clients must respond to the contents contained in Appellant's brief. Therefore, Respondents contend there is nothing to respond to at this juncture as Appellant has not cured the deficiencies noted by this Honorable Court and the Court has not ruled upon the Motion and Return related to the same. Nevertheless, if this Court would like Respondents to file a "Motion for Extension of Time" to file their initial brief until after this Court rules on Appellant's Motion to Exceed Page

Limit and cures the second deficiency referenced in this Court's June 30, 2022, letter to Appellants, kindly advise.

I appreciate your time and attention to this matter. If you have any questions or concerns with regards to this request, please do not hesitate to contact me.

With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.


John Gabriel Coggiola

JGC/jgc

cc: Mr. Preston F. McDaniel, Esquire (via email)
Mr. Gerald Malloy, Esquire (via email)