

97385  
**RECEIVED**

OCT 21 2022  
SC Court of Appeals

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

**APPEAL FROM THE CHARLESTON COUNTY COURT OF COMMON PLEAS**

**THE HONORABLE R. FERRELL COTHRAN, JR., CIRCUIT COURT JUDGE**

**Appellate Case No. 2022-000674**

Kevin Dion Hollinshead, Senior,..... Appellant,

v.

Thomas J. Bell, individually and as Executive Director of Charleston Coalition for Kids, Charleston Coalition for Kids, a nonprofit Organization, Angelica M. Colwell, Lee P. Deas, Godfrey A. Gibbison, Eric P. Strickland, Loren R. Ziff, Courtney S. Waters, Leeza D. Steward, and Teach for America, Inc..... Respondents.

**MOTION FOR EXTENSION**

**PLEASE TAKE NOTICE THAT** Appellant, Kevin Dion Hollinshead, Senior, hereby moves this Court for an Order extending the deadlines in the briefing schedule by thirty (30) days and is made on the grounds that the current deadline for submitting is October 20, 2022. The basis for this motion is as follows:

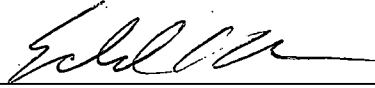
1. The Notice of Intent in this matter was filed May 17, 2022.
2. Thereafter on June 7, 2022, June 8, 2022, and June 9, 2022, the Respondents each filed motions to dismiss.
3. The motions to dismiss were each denied by this Court on July 22, 2022.
4. On August 23, 2022, the hearing transcript was received by Counsel for Appellant who notified this Court of the same by letter dated September 8, 2022.
5. Counsel for Appellant mistakenly believed that after sending notice of receipt of this transcript to this Court that a new briefing schedule would be forthcoming.

6. On October 10, 2022, this Court sent out a notice to Counsel for Appellant that Appellant's initial brief is past due and must be filed in the (10) days of the date of the letter.
7. That Counsel for Appellant has two other active appeals before this Court in the matter of *Charleston Advancement Academy v. South Carolina Charter School District*, Appellate Case No. 2021-00001414 and Appellate Case No. 2022-000289, the brief or briefs (Counsel is sorting through whether to file one brief as permitted by order of this Court dated or two in those matters as this is being written) in which is/are due November 2, 2022.
8. That Counsel is busily working on the briefs in the *Charleston Advancement Academy v. South Carolina Charter School District* appeals and suspended doing so only long enough to draft this motion.
9. That the appeals in the *Charleston Advancement Academy v. South Carolina Charter School District* predate the appeal in this case.
10. That the appeals in the *Charleston Advancement Academy v. South Carolina Charter School District* involve complex questions relating to the jurisdiction of the Court of Common Pleas and the Administrative Law Court.
11. That it would be exceedingly difficult for Counsel for Appellant to get all briefs filed in all matters including this one by the deadlines.
12. That Counsel needs a thirty (30) day extension to file the initial brief and designation of matters to be included in the record.

**BASED ON THE FOREGOING**, Appellant, Kevin Dion Hollinshead, Senior, hereby respectfully request that he be granted a thirty (30) day extension to file his Initial Brief of Appellant and Appellant's Designation of Matter to be Included in the Record on Appeal.

**RESPECTFULLY SUBMITTED:**

**PRITCHARD LAW GROUP, LLC**



---

Edward K. Pritchard, III, Esq.  
South Carolina Bar No. 9710  
8 Cumberland Street, Suite 200  
Post Office Box 630  
Charleston, South Carolina 29402  
Phone: (843) 722-3300  
Fax: (843) 722-3379  
e-mail: [epritchard@pritchardlawgroup.com](mailto:epritchard@pritchardlawgroup.com)  
**ATTORNEY FOR APPELLANT,**  
**KEVIN DION HOLLINSHEAD, SENIOR**

October 14, 2022  
Charleston, South Carolina

**RECEIVED**

OCT 21 2022

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

**APPEAL FROM THE CHARLESTON COUNTY COURT OF COMMON PLEAS**

**THE HONORABLE R. FERRELL COTHRAN, JR., CIRCUIT COURT JUDGE**

**Docket No. 2021-CP-10-00426**

Kevin Dion Hollinshead, Senior,..... Appellant,

v.

Thomas J. Bell, individually and as Executive Director of Charleston Coalition for Kids, Charleston Coalition for Kids, a nonprofit Organization, Angelica M. Colwell, Lee P. Deas, Godfrey A. Gibbison, Eric P. Strickland, Loren R. Ziff, Courtney S. Waters, Leeza D. Steward, and Teach for America, Inc..... Respondents.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a complete and accurate copy of the foregoing *Motion for Extension* on all counsel of record, as listed below, on October 14, 2022, via e-mail:

Julianne Farnsworth, Esq.  
(SC Bar No.: 7841)

E-mail: [jfarnsworth@grsm.com](mailto:jfarnsworth@grsm.com)

Victoria T. Kepes, Esq.  
(SC Bar No.: 102536)

E-mail: [vkepes@grsm.com](mailto:vkepes@grsm.com)

Brittany Tanya Bihun

E-mail: [bbihun@grsm.com](mailto:bbihun@grsm.com)

**GORDON REES SCULLY MANSUKHANI, LLP**

40 Calhoun Street, Suite 350

Charleston, South Carolina 29401

**ATTORNEYS FOR RESPONDENTS, CHARLESTON COALITION FOR KIDS, THOMAS J. BELL, ANGELICA M. COLWELL, LEE P. DEAS, GODFREY A. GIBBISON, ERIC P. STRICKLAND AND LOREN R. ZIFF  
GREEN LEGAL AND CONSULTING LLC**


Dwayne Green, Esq.  
(SC Bar No. 9559)  
E-mail: [dwayne@greenlawsc.com](mailto:dwayne@greenlawsc.com)  
720 Magnolia Road— Suite 24  
Charleston, South Carolina 29407  
Telephone: (843) 266-2626  
ATTORNEY FOR RESPONDENT COURTNEY WATERS  
MCCULLOCH & SCHILLACI, ATTORNEYS AT LAW

Joseph M. McCulloch, Esq.  
(SC Bar No. 3760)  
e-mail: [joe@mccullochlaw.com](mailto:joe@mccullochlaw.com)  
1116 Blanding Street  
Post Office Box 11623 (29211)  
Columbia, South Carolina 29201  
Telephone: (803) 779-0005  
Fax: (803) 779-0666  
ATTORNEYS FOR RESPONDENT, LEEZA D. STEWARD

David S. Cobb, Esq.  
(SC Bar No. 66569)  
E-mail: [dcobb@turnerpadget.com](mailto:dcobb@turnerpadget.com)  
Nickisha M. Woodward  
(SC Bar No. 101432)  
E-mail: [nwoodwardward@turnerpadget.com](mailto:nwoodwardward@turnerpadget.com)  
TURNER PADGET GRAHAM LANEY  
40 Calhoun Street, Suite 200  
Charleston, South Carolina 29401  
Telephone: (843) 576-5805  
ATTORNEYS FOR RESPONDENT, TEACH FOR AMERICA, INC.

October 14, 2022  
Charleston, South Carolina

Pritchard Law Group, LLC

  
\_\_\_\_\_  
Edward K. Pritchard, III, Esq

---

# pritchard

LAW GROUP

Edward K. Pritchard, III, Esq.  
Certified Mediator  
E-mail: [epritchard@pritchardlawgroup.com](mailto:epritchard@pritchardlawgroup.com)

**RECEIVED**  
OCT 21 2022  
SC Court of Appeals

October 14, 2022

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
1220 Senate Street  
Post Office Box 11629  
Columbia, South Carolina 29211-1629


**RE: Case Caption:** *Kevin Dion Hollinshead, Senior, Appellant, v. Thomas J. Bell, individually and as Executive Director of Charleston Coalition for Kids, Charleston Coalition for Kids, a nonprofit Organization, Angelica Colwell, Lee Deas, Godfrey Gibbison, Eric Strickland, Loren Ziff, Courtney Waters, Lezza Steward, and Teach for America, Inc., Respondents.*  
Appeal No.: 2022-000674

Dear Ms. Kitchings:

Enclosed herewith for filing please see an original and one copy of a *Motion for Extension* of Appellant, *Kevin Dion Hollinshead, Senior*, a check in the amount of \$50.00 made payable to the South Carolina Court of Appeals for the filing fee and a self-addressed return envelope. Please file the motions and return a filed stamped copy in the enclosed envelope. By copy of this letter I am serving counsel for Respondent with a copy of the motion.

With warmest personal regards, I am

Yours very truly,

  
Edward K. Pritchard, III  
*Attorney for Plaintiff, Kevin Dion  
Hollinshead, Sr.*

cc: Julianne Farnsworth, Esq. (via e-mail)  
Victoria T. Kepes, Esq. (via e-mail)

The Honorable Jenny Abbott Kitchings

October 14, 2022

Page 2 of 2

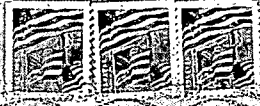
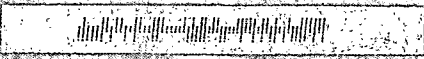
Brittany Tanya Bihun, Esq. (via e-mail)

Joseph M. McCulloch, Jr. (via e-mail)

David Starr Cobb, Esq. (via e-mail)

Nickisha M Woodward, Esq. (via e-mail)

Dwayne Marvin Green, Esq. (via e-mail)



CHARLESTON, SC 294  
OCT 21 2022 07



PRITCHARD  
LAW GROUP

8 CUMBERLAND STREET, SUITE 200  
CHARLESTON, SC 29401

**RECEIVED**

OCT 21 2022

*SC Court of Appeals*

THE HONORABLE JENNY ABBOTT KITCHINGS  
CLERK OF COURT  
1220 SENATE STREET  
POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211-1629

