

**RECEIVED**

**Oct 26 2022**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
R. FERRELL COTHRAN, JR., CIRCUIT COURT JUDGE

---

Appellate Case No.: 2022-000674

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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,  
Godrey A. Gibson, Eric P. Strickland, Loren R. Ziff, Courtney S. Waters, Leeza D. Steward,  
and Teach for America, Inc. .... Respondents

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**RESPONDENTS’ RESPONSE IN OPPOSITION AND OBJECTION TO  
APPELLANT’S MOTION FOR EXTENSION**

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Respondents Thomas J. Bell, individually and as Executive Director of Charleston Coalition of Kids, Charleston Coalition for Kids, a nonprofit Organization, Angelica M. Colwell, Lee P. Deas, Godrey A. Gibson, Eric P. Strickland, Loren R. Ziff, Courtney S. Waters, Leeza D. Steward, and Teach for America, Inc. (collectively, “Respondents”), by and through their undersigned counsel, hereby file this response in opposition and objection to Appellant Kevin Dion Hollinshead, Senior’s (“Appellant”) motion for extension (the “Motion”), received by the Court of Appeals on October 21, 2022.

On August 23, 2022, counsel for Appellant received the transcript of the hearing in the underlying matter. (Motion ¶ 4.) Thus, pursuant to Rule 208(a)(1), SCACR, Appellant was

required to file his opening brief by September 22, 2022. Appellant did not do so and did not ask for an extension of time to do so.

On October 10, 2022, this Court served a letter on counsel for Appellant requiring that “Within ten (10) days of the date of this letter, **you must serve and file the appellant’s initial brief** and designation of matter, along with a motion requesting permission to serve and file the appellant’s initial brief and designation of matter outside of the filing deadlines set by Rules 208 and 209 of SCACR.” (emphasis added.) Appellant did not do so. The Court also stated in the letter, “Failure to comply with the Court’s request within ten (10) days of the date of this letter will result in the dismissal of this appeal.”

On October 25, 2022, counsel for Respondents went to the online docket and saw, for the first time, that Appellant had apparently filed the Motion. (See Affidavits of Brittany T. Bihun, Joseph M. McCulloch, and Nickisha M. Woodward, attached hereto as **Exhibits 1, 2, and 3**, respectively.) The Motion, while seemingly dated October 14, 2022 and including a Certificate of Service saying such Motion was served on all counsel via email the same day, was not received by the Court until October 21, 2022. One day after the expiration of the Court’s required deadline for filing both the opening brief and motion for extension of time to file such brief late. In direct contravention to the Certificate of Service attached to the Motion, no counsel for any of the Respondents was served, via email or otherwise, with the Motion on October 14, 2022, or at any time thereafter. (See **Exhibits 1, 2, and 3**.)<sup>1</sup>

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<sup>1</sup> Upon information and belief, counsel for Respondent Courtney Waters, Dwayne Green, Esq., also did not receive any notice of the Motion, via email or otherwise.

Regardless of Appellant's filing of the Motion with the Court without serving it on any opposing counsel, it does not cure the defects noticed on Appellant by the Court on October 10, 2022, and thus, Appellant's appeal should be dismissed.

### ARGUMENT

Pursuant to Rule 208(a)(4), SCACR, “[w]ithin thirty (30) days after receiving the transcript [or] within thirty (30) days after serving the notice of appeal, appellant shall serve one copy of his brief on all parties to the appeal....” Rule 260, SCACR, provides “[w]henver it appears that an appellant... has failed to comply with the requirements of these Rules, the clerk shall issue an order of dismissal, which shall have the same force and effect as an order of the appellate court.” Rule 260(a), SCACR, further provides that a dismissed case “shall not be reinstated except by leave of the court, upon good cause shown, after notice to all parties.”

The Supreme Court of South Carolina has stated “the South Carolina Appellate Court Rules are not mere technicalities but provide the parties and this Court with an orderly mechanism through which to guide appeals in this State.” *Henning v. Kaye*, 307 S.C. 436, 415 S.E.2d 794 (1992). Courts may find good cause or excusable failure to comply with the rules where it characterizes the failure as a good faith error coupled with a diligent response. *Id.* (allowing amendments to appellant's brief although “completely justified in dismissing [the] appeal.”). *See also, Jordan v. Hartford Fin. Group, Inc.*, 435 S.C. 501 (Ct. App. 2021) (finding good cause where a calendar mishap resulted in a one-day delay); *Columbia Pools, Inc. v. Galvin*, 288 S.C. 59, 61, 339 S.E. 524, 525 (Ct. App. 1986) (finding “no attempt to thwart the judicial system”); and *Micronics, Inc. v. S.C. Dep't of Rev.*, 345 S.C. 506, 511, 548 S.E.2d 223, 226 (Ct. App. 2001) (finding no evidence of bad faith coupled with speed in asking for rehearing). However, the Supreme Court has made clear that “[w]henver it appears that an appellant has failed to comply

with the requirements of the SCACR, an order of dismissal *shall be issued.*” *Wise v. South Carolina Dept. of Corrections*, 372 S.C. 173, 174 642 S.E.2d 551, 551 (2007) (emphasis added).

Further, South Carolina courts routinely refuse to excuse untimely filings where coupled with a pattern of untimely behavior or other violations of the Rules of Professional Conduct, and the Supreme Court may even impose sanctions for such conduct. *See, In re Houston*, 415 S.C. 594 (2016) (suspending attorney nine months and requiring completion of legal ethics courses for a pattern of behavior including failure to timely file his client’s appeal).

Here, by Appellant counsel’s own admission, he is well versed in the South Carolina Appellate Court Rules and has multiple cases pending before the Court. (Motion ¶¶ 7-10.) Without a doubt, counsel for Appellant knew, before October 10, 2022, that he would have multiple appellate briefs due at around the same time and did not seek additional time until the Court’s letter informing him of the requirements to proceed with the appeal after failing to file the brief in the time prescribed by the Rules. In addition, there can simply be no excuse for a “mistaken[] belief” that the Court would issue a “new” briefing schedule. (Motion ¶ 5.) There was never a first briefing schedule issued by the Court, so there could be no reason to believe the Court would issue a “new” one, and the Rules explicitly say the appellant’s opening brief is due within thirty days of receipt of the transcript. Moreover, Appellate has failed to comply with the most important part of the Court’s October 10, 2022 letter, in that the brief was not filed with the Motion, as was required. Respondents vehemently object to Appellant being allowed any additional time to file a brief as Appellant has failed to provide any good cause for the failure to file the brief at all, let alone, just late. The Rules are not “mere technicalities,” and this Court should enforce them as written and dismiss the appeal.

WHEREFORE, having fully set forth the grounds for the relief sought herein, Respondents move for an order dismissing this appeal.

Dated: October 26, 2022

Respectfully submitted,

*s/Brittany T. Bihun*

Brittany T. Bihun (S.C. Bar No. 102496)

**GORDON & REES LLP**

40 Calhoun Street, Suite 350

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Telephone 843-278-5900

[bbihun@grsm.com](mailto:bbihun@grsm.com)

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

*s/Dwayne Green*

Dwayne Green (S.C. Bar No. 9559)

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ATTORNEYS FOR RESPONDENT COURTNEY WATERS

*s/Joeseeph M. McCulloch*

Joseph M. McCulloch (S.C. Bar No. 3760)

**McCULLOCH & SCHILLACI, ATTORNEYS AT LAW**

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[joe@mccullochlaw.com](mailto:joe@mccullochlaw.com)

ATTORNEYS FOR RESPONDENT LEEZA D. STEWARD

*s/Nickisha M. Woodward* \_\_\_\_\_

David S. Cobb (S.C. Bar No. 66569)

Nickisha M. Woodward (S.C. Bar No. 101432)

**TURNER PADGET GRAHAM AND LANEY  
P.A.**

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[dcobb@turnerpadget.com](mailto:dcobb@turnerpadget.com)

[nwoodward@turnerpadget.com](mailto:nwoodward@turnerpadget.com)

ATTORNEYS FOR RESPONDENT TEACH FOR  
AMERICA, INC.

# EXHIBIT 1

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
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,  
Godrey A. Gibson, Eric P. Strickland, Loren R. Ziff, Courtney S. Waters, Leeza D. Steward,  
and Teach for America, Inc. .... Respondents

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**AFFIDAVIT OF BRITTANY T. BIHUN**

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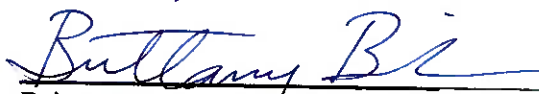
PERSONALLY APPEARED BEFORE ME, Brittany T. Bihun, who, being duly sworn,  
deposes and says:

1. I am a practicing attorney licensed in the State of South Carolina and attorney of record for Respondents Thomas J. Bell, individually and as Executive Director of Charleston Coalition of Kids, Charleston Coalition for Kids, a nonprofit Organization, Angelica M. Colwell, Lee P. Deas, Godrey A. Gibson, Eric P. Strickland, and Loren R. Ziff in the above-captioned appellate matter.

2. Today, October 25, 2022, I searched e-filing for the above-captioned appellate matter and discovered Appellant Kevin Dion Hollinshead, Senior's Motion for Extension and attached Certificate of Service, dated October 14, 2022.

3. While the attached Certificate of Service states that I received a copy of the Motion for Extension via email on October 14, 2022, as of this date, and after a search of our office computer and mail files, I have not received a copy via email, hand delivery, or mail.

FURTHER, DEPONENT SAYETH NAUGHT.



Brittany T. Bihun (S.C. Bar No. 102496)

**GORDON & REES LLP**

40 Calhoun Street, Suite 350

Charleston, SC 29401

Telephone 843-278-5900

[bbihun@grsm.com](mailto:bbihun@grsm.com)

STATE OF South Carolina

COUNTY OF Charleston

SWORN and subscribed to before me this

the 25 day of October, 2022.



Notary Public for South Carolina

My commission expires: 2-26-30

# EXHIBIT 2

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
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, Godrey A. Gibson, Eric P. Strickland, Loren R. Ziff, Courtney S. Waters, Leeza D. Steward, and Teach for America, Inc. .... Respondents

---

**AFFIDAVIT OF JOSEPH M. MCCULLOCH**

---

PERSONALLY APPEARED BEFORE ME, Joseph M. McCulloch, who, being duly sworn, deposes and says:

1. I am a practicing attorney licensed in the State of South Carolina and attorney of record for Leeza D. Steward in the appellate matter captioned *Kevin Hollinshead, Sr. v. Thomas Bell* (Appellate Case No. 2022-000674).

2. Since the inception of this Appeal, Appellant counsel failed to timely meet Court and Rule imposed deadlines twice (see Court Docket and May 31<sup>st</sup> deficiency letter and attached) and was permitted latitude to file out of conformity with our Rules.

3. On or about October 10, 2022, the Clerk of the South Carolina Court of Appeals sent a letter of that date, to appellant counsel advising “Within ten (10) days of the date of this letter (October 10), you must serve and file the appellants initial brief.... Failure to comply with the Court’s request within ten (10) days of the date of this letter will result in the dismissal of this appeal (*see Attachment 1*).

4. Today, October 25, 2022, my office searched e-filings for the captioned matter and discovered the attached letter dated October 14, 2022 and Certificate of Service were filed with the Court on October 21, 2022 (*see Attachment 2*). As of this date, October 25, 2022 this letter has not been received by this office by mail, hand delivery, or email.

5. After a diligent search of our office computer emails, including inbox, junk mail, deleted mail, we find no evidence of the emailing of the letter Attachment to anyone in this office on October 14, or at any time, until discovered today, October 25, 2022.


6. This counsel is informed and believes the appeal of Appellant Hollinshead should be dismissed.

FURTHER, DEPONENT SAYETH NAUGHT.



Joseph M. McCulloch, Esq.  
McCulloch & Schillaci, Attorneys at Law  
1116 Blanding Street (29201)  
P.O. Box 11623  
Columbia, South Carolina 29211  
(803) 779-0005  
[joe@mccullochlaw.com](mailto:joe@mccullochlaw.com)

SWORN TO AND SUBSCRIBED  
before me this 25<sup>th</sup> day of October, 2022.

  
\_\_\_\_\_  
NOTARY PUBLIC FOR SOUTH CAROLINA

Print Name: Elizabeth Gunter  
My commission expires: 12/7/25

# **Attachment 1**



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
1220 SENATE STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
www.sccourts.org

October 10, 2022

Mr. Edward K. Pritchard, III, Esquire  
Pritchard Law Group, LLC  
8 Cumberland Street, Suite 200  
Charleston SC 29401

Re: Kevin Hollinshead, Sr. v. Thomas Bell  
Appellate Case No. 2022-000674

Dear Counsel:

Our records reflect that the time for serving and filing the appellant's initial brief and designation of matter has expired. **Within ten (10) days of the date of this letter, you must serve and file the** appellant's initial brief and designation of matter, along with a motion requesting permission to serve and file the appellant's initial brief and designation of matter outside of the filing deadlines set by Rules 208 and 209 of the SCACR. Your appellant's initial brief and designation of matter will not be considered if no motion is made. **Failure to comply with the Court's request within ten (10) days of the date of this letter will result in the dismissal of this appeal.**

Very truly yours,

*V. Claire Allen*  
CLERK

cc: Dwayne Marvin Green, Esquire  
Joseph M. McCulloch, Jr., Esquire  
David Starr Cobb, Esquire  
Nickisha M Woodward, Esquire  
Brittany Tanya Bihun, Esquire

# **Attachment 2**

**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)**

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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

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Charleston, South Carolina 29402

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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

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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**

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(SC Bar No. 9559)

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ATTORNEY FOR RESPONDENT COURTNEY WATERS  
MCCULLOCH & SCHILLACI, ATTORNEYS AT LAW

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Nickisha M. Woodward  
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40 Calhoun Street, Suite 200  
Charleston, South Carolina 29401  
Telephone: (843) 576-5805

ATTORNEYS FOR RESPONDENT, TEACH FOR AMERICA, INC.

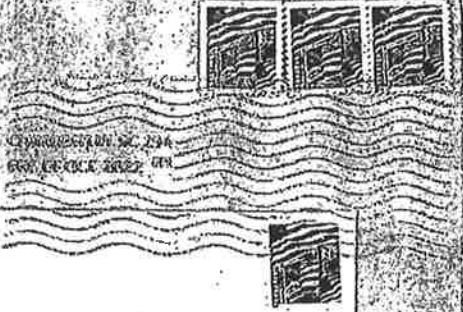
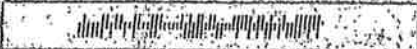
Pritchard Law Group, LLC



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Edward K. Pritchard, III, Esq

October 14, 2022  
Charleston, South Carolina



CHARLESTON, SC 29401  
664 48324 2122 678



**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

# EXHIBIT 3

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
R. FERRELL COTHRAN, JR., CIRCUIT COURT JUDGE

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Appellate Case No.: 2022-000674

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Kevin Dion Hollinshead, Senior.....Appellant

v.

Thomas J. Bell, individually and as Executive Director of Charleston Coalition for Kids,  
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Godrey A. Gibson, Eric P. Strickland, Loren R. Ziff, Courtney S. Waters, Leeza D. Steward, and  
Teach for America, Inc.....Respondents

---

**AFFIDAVIT OF NICKISHA M. WOODWARD**

PERSONALLY APPEARED BEFORE ME, Nickisha M. Woodward, who, being duly sworn, deposes and says:

1. I am a practicing attorney licensed in the State of South Carolina and attorney of record for Respondents Teach for America, Inc. in the above-captioned appellate matter.

2. Today, October 25, 2022, I searched e-filing for the above-captioned appellate matter and discovered Appellant Kevin Dion Hollinshead, Senior's Motion for Extension and attached Certificate of Service dated October 14, 2022.

3. While the attached Certificate of Service states that I received a copy of the Motion for Extension via email on October 14, 2022, as of this date, and after a search of our office computer and email files, I have not received a copy via email, hand delivery or mail.

FURTHER, DEPONENT SAYETH NAUGHT.

Nickisha M. Woodward

Nickisha M. Woodward

SC Bar No. 101432

Post Office Box 22129

Charleston, South Carolina 29413

Phone: 843-576-2805

Fax: 843-577-1627

Email: [nwoodward@turnerpadget.com](mailto:nwoodward@turnerpadget.com)

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

SWORN and subscribed to before me this

26 day of October, 2022.

Paul M. Moore

Notary Public for South Carolina

My commission expires: May 14, 2023

**RECEIVED**

**Oct 26 2022**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
R. FERRELL COTHRAN, JR., CIRCUIT COURT JUDGE

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Appellate Case No.: 2022-000674

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

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Godrey A. Gibson, Eric P. Strickland, Loren R. Ziff, Courtney S. Waters, Leeza D. Steward,  
and Teach for America, Inc. .... Respondents

---

**PROOF OF SERVICE**

---

I certify that I have served Respondents Response in Opposition and Objection to Appellant’s Motion for Extension via Eail upon the respective attorneys of record as properly addressed below this 26<sup>th</sup> day of October, 2022:

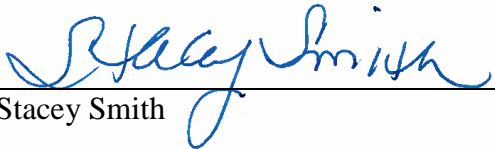
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October 26, 2022

**VIA ELECTRONIC FILING**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
**Oct 26 2022**  
**SC Court of Appeals**

Re: *Kevin Dion Hollinshead, Senior v. Thomas J. Bell, individually and as Executive Director of Charleston Coalition for Kids, et al.*  
Appellate Case No.: 2022-000674

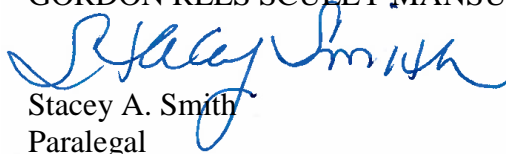
Dear Ms. Kitchings:

Please find enclosed for filing on behalf of all Respondents in the above referenced matter Respondents' Response in Opposition and Objection to Appellant's Motion for Extension and Proof of Service of the same.

Please let me know if you need anything further or if you have any questions.

Sincerely,

GORDON REES SCULLY MANSUKHANI, LLP

  
Stacey A. Smith  
Paralegal

SAS:  
Enclosures

Cc: All Counsel of Record (Via Email)