

RECEIVED

Nov 15 2022

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM BERKELEY COUNTY
Kristi Lea Harrington, Circuit Court Judge

Supreme Court Case No. 2021-001520
Appellate Case No. 2018-000791
Case No. 2016-CP-08-0131

Jeffrey Lance Cruce,

Petitioner,

v.

Berkeley County School District,

Respondent.

**PETITIONER’S MOTION FOR EXTENSION OF TIME TO FILE
REPLY BRIEF OUT OF TIME**

Petitioner respectfully moves this Court for an extension of time through December 9, 2022 to file a Reply brief. The basis for this motion is Respondent was recently granted additional time to file its brief through November 21, 2022, but Petitioner’s counsel will be traveling out of the country beginning November 20, 2022 through December 1, 2022 on a previously planned vacation. Petitioner will, therefore, not be able to timely review Respondent’s brief and prepare a Reply within ten (10) days of receipt of Respondent’s Brief. Counsel has consulted with opposing counsel who has consented to the relief requested. Petitioner respectfully requests this Court accept her request for an extension and to accept the filing of Petitioner’s Reply Brief on December 9, 2022.

Respectfully submitted,

BLOODGOOD & SANDERS, LLC

By: s/Nancy Bloodgood

Nancy Bloodgood #6459

242 Mathis Ferry Road, Suite 201

Mt. Pleasant, SC 29464

(843) 972-0313

Counsel for Petitioner

Mt. Pleasant, South Carolina

Date: November 15, 2022

Nancy Bloodgood

From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Tuesday, November 15, 2022 11:03 AM
To: Nancy Bloodgood
Subject: Re: Cruce extension

Of course. Thanks for your help.

Andrew

Sent from my iPhone

On Nov 15, 2022, at 10:52 AM, Nancy Bloodgood <nbloodgood@bloodgoodsanders.com> wrote:

Andrew, Now that you have an extension until November 21st to file your brief, I have realized I'll be in Tuscany when you serve your brief and I won't be back in Charleston until December 1st. Will you consent to an extension until December 9th for me to file a Reply? Thanks in advance, Nancy

Nancy Bloodgood, Partner
Bloodgood & Sanders, LLC
242 Mathis Ferry Road, Suite 201
Mt. Pleasant, S.C. 29464
843-972-0313
nbloodgood@bloodgoodsanders.com