

**RECEIVED**

**Nov 15 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Deadra L. Jefferson, Circuit Court Judge

Case No.: 2014-CP-10-4591  
Appellate Case No. 2021-000721

Jane Doe 202, by John Doe MM and John Doe HS, each of whom holds power of attorney for Jane Doe .....Appellant,

v.

City of North Charleston; Leigh Anne McGowan, individually, Charles Francis Wholleb, individually, and Anthony M. Doxey, individually .....Respondents.

**RESPONDENTS' MOTION TO EXTEND TIME**

Now come Respondents and move to extend the deadline to file Respondents' Brief by thirty days. Appellant filed her Brief on October 23, 2022, thereby making Respondents' Brief due by November 22, 2022. Since the filing of Appellant's Brief, the undersigned has had multiple briefing deadlines in federal court as well as mediations and depositions that had been previously scheduled. Additionally, the undersigned has a medical procedure scheduled for November 22, 2022, which will require him to be out of the office all day. For these reasons, Counsel for Respondents is requesting additional time to adequately prepare Respondents' Brief. The undersigned has attempted to consult with Counsel for Appellant on two occasions, but unfortunately, has not received a response.

Therefore, Respondents respectfully request this honorable court allow a twenty-day extension to file a Respondents' Brief, which would make the Brief due on or before December 12, 2022.

Respectfully moved,

*s/Christopher T. Dorset*  
CHRISTOPHER T. DORSEL  
SC Bar No. 72504  
Senn Legal, LLC  
P.O. Box 12279  
Charleston, SC 29422  
(843) 556-4045

*Attorney for Respondents*

November 15, 2022  
Charleston, South Carolina

**RECEIVED**

**Nov 15 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Deadra L. Jefferson, Circuit Court Judge

Case No.: 2014-CP-10-4591  
Appellate Case No. 2021-000721

Jane Doe 202, by John Doe MM and John Doe HS, each of whom holds power of attorney for Jane Doe .....Appellant,

v.

City of North Charleston; Leigh Anne McGowan, individually, Charles Francis Wholleb, individually, and Anthony M. Doxey, individually .....Respondents.

**RESPONDENTS' PROOF OF SERVICE**

I certify that I have served copies of Motion to Extend Time on November 15, 2022 by email at the address listed below:

Gregg Meyers  
Attorney At Law  
217 Lucas Street Unit F1  
Mt. Pleasant, SC 29464

[attygm@gmail.com](mailto:attygm@gmail.com)

Respectfully submitted,

*s/Christopher T. Dorsel*  
CHRISTOPHER T. DORSEL  
SC Bar No. 72504  
Senn Legal, LLC  
P.O. Box 12279  
Charleston, SC 29422  
(843) 556-4045  
*Attorney for Respondents*