

97877

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

DEC 29 2022

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Roger M. Young, Sr., Circuit Court Judge

Case No. 2021-01414

Charleston Advancement Academy, Inc. Appellant.

v.

South Carolina Public Charter School District, Respondent,

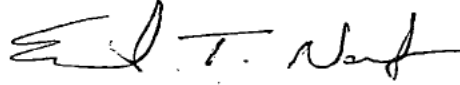
RESPONDENT'S MOTION TO EXTEND BRIEFING SCHEDULE

Respondent respectfully moves this Court for an Order extending the deadlines in the briefing schedule by thirty (30) days such that Respondent's Initial Brief, currently due on January 5, 2023, will be due on February 6, 2023. This is Respondent's first request for extension. This is Respondent's first request for extension. The basis for the request is Respondent's current work schedule and planned time away from the office during the upcoming holidays require additional time to prepare the brief. Due to the lack of access to printers/scanners during the holidays, Appellant's consent is indicated on the email attached here as Exhibit A.

<signature block next page>

WE SO MOVE:

HARRELL, MARTIN & PEACE, PA:



Erik T. Norton, SC Bar No. 73860

135 Columbia Avenue

Chapin, South Carolina 29036

Phone: (803) 345-3353

E-Mail: erik@hmp-law.com

***ATTORNEYS FOR SOUTH CAROLINA
PUBLIC CHARTER SCHOOL DISTRICT***

December 28, 2022
Chapin, South Carolina.

RE: CAA Appeals

Edward Pritchard <epritchard@pritchardlawgroup.com>

Mon 12/19/2022 12:39 PM

To: Erik Norton <Erik@hmp-law.com>; Tyler Turner <tturner@turnercaudell.com>

Erik,

You, of course, have my consent. I do not at this moment have access to a scanner/printer. I will sign and return it later today.

Edward

From: Erik Norton <Erik@hmp-law.com>

Sent: Monday, December 19, 2022 11:31 AM

To: Edward Pritchard <epritchard@pritchardlawgroup.com>; Tyler Turner <tturner@turnercaudell.com>

Subject: CAA Appeals

Gentlemen,

Would you please review the attached and indicate your consent if they meet your approval? Thanks in advance.

Best regards,

Erik



Erik T. Norton

Attorney

Mailing address: PO Box 1000, Chapin, SC 29036

Physical address: 135 Columbia Ave., Chapin, SC 29036

Telephone: 803.345.3353 | Direct Dial: 803.298.2103

Harrellmartinpeace.com

erik@hmp-law.com

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

DEC 29 2022

APPEAL FROM CHARLESTON COUNTY
Roger M. Young, Sr., Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2021-01414

Charleston Advancement Academy, Inc..... Plaintiff/Appellant,

v.

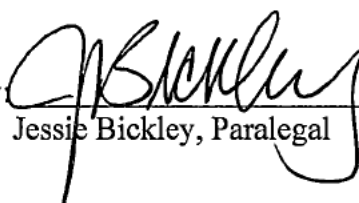
South Carolina Public Charter School District.....Defendant/Respondent.

PROOF OF SERVICE

I, Jessie Bickley, an employee with the firm of Harrell, Martin & Peace, P.A., do hereby certify that on December 28, 2022, I served a copy of the Respondent's Motion for Extension in the above captioned case on the following individuals by electronic mail using their email address listed in the Attorney Information System, addressed as follows:

Edward Pritchard
PRITCHARD LAW GROUP, LLC
8 Cumberland Street, Suite, 200
Charleston, South Carolina 29401

Tyler R. Turner, Esq.
TURNER & CAUDELL, LLC
914 Richland Street, Suite A-101
Columbia, SC 29201

By 
Jessie Bickley, Paralegal

December 28, 2022



HARRELL, MARTIN
& PEACE, P.A.
ATTORNEYS AT LAW

L.K. "Trey" Harrell, III
Jeremy C. Martin
M. Alan Peace **
Taylor A. Peace
Andrea "Andi" Cornelison
Erik T. Norton

Robert W. Dibble, Jr. *
William Jennings (Bill) Buchanan *
Donald W. Tyler *
Thomas B. Jackson, III *

*Of Counsel
**Certified Mediator/Arbitrator

December 28, 2022

VIA OVERNIGHT DELIVERY

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

DEC 29 2022

SC Court of Appeals

Re: **Charleston Advancement Academy, Inc. v. South Carolina Public Charter
School District.**
C/A No.: 2021-01414 and 2022-00289

Dear Ms. Kitchings:

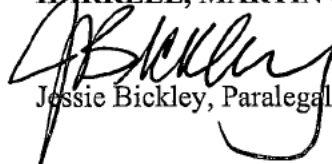
Enclosed for filing please find Respondent's First Motions for Extension of the briefing schedules in the above-referenced related cases along with the required filing fee for each motion in the total amount of \$100.

By copy of this letter and as evidenced by the Proof of Service, these filings have been served upon counsel for Appellant.

Thank you for your time and attention in this matter. If you have any questions, please do not hesitate to contact our office at the phone number below.

Sincerely,

HARRELL, MARTIN & PEACE, P.A.


Jessie Bickley, Paralegal

Enclosures

Mailing Address: Post Office Box 1000, Chapin, South Carolina 29036
Physical Address: 135 Columbia Avenue, Chapin, South Carolina 29036
Telephone: 803-345-3353 • Fax: 803-345-9171
harrellmartinpeace.com

