

**RECEIVED**  
**Jan 17 2023**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Robert E. Hood, Circuit Court Judge

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Appellate Case No. 2022-001218  
Case No. 2018-CP-40-4835

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Joseph P. Sellaro, ..... Respondent,

v.

The South Carolina Department of Social Services  
and the Richland County Sheriff's Department, ..... Defendants,

Of which, The South Carolina Department of  
Social Services is the..... Appellant.

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**MOTION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEF OF APPELLANT**

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The Appellant South Carolina Department of Social Services respectfully moves this Court for an additional fifteen day extension of time until February 1, 2023, by which to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellant's motion is based on the following grounds:

1. The Appellant's Initial Brief is currently due to be filed and served on January 17, 2023.

2. The undersigned counsel requires additional time to complete the Appellant's Initial Brief due to other court appearances, obligations, and court deadlines, including a trial in the Charleston County Court of Common Pleas on January 12, 2023, and Federal Court jury selection on January 17, 2023. In addition, the undersigned counsel has had a death in his wife's family and a family-related trip that will prevent the completion of the brief by the current deadline.

3. The undersigned has consulted with counsel for the Respondent who have consented to the requested extension by email (copy attached).

WHEREFORE, the Appellant South Carolina Department of Social Services respectfully requests that it be allowed until February 1, 2023, by which to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN LAW FIRM, P.A.

BY: s/ Andrew F. Lindemann  
ANDREW F. LINDEMANN #13030  
5 Calendar Court, Suite 202  
Post Office Box 6923  
Columbia, South Carolina 29260  
(803) 881-8920  
Email: andrew@ldlawsc.com

*Counsel for Appellant South Carolina  
Department of Social Services*

January 14, 2023

**From:** [Karl Brehmer](#)  
**To:** [Paige George](#)  
**Cc:** [Andrew Lindemann](#); [summers@mtsolfirm.com](mailto:summers@mtsolfirm.com); [Jennifer Baker](#)  
**Subject:** Re: Sellaro v. South Carolina Department of Social Services  
**Date:** Saturday, January 14, 2023 10:56:00 AM

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We consent

Sent from my iPhone

On Jan 14, 2023, at 10:47 AM, Paige George <[lawyer@paigebgeorge.com](mailto:lawyer@paigebgeorge.com)> wrote:

Mr. Lindemann:

We consent to the 15 day extension. I am sorry for your loss and hope you have safe travels to Alabama.

Paige

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Paige B. George, Attorney at Law  
Law Office of Barry B. George  
1419 Bull Street  
Columbia, South Carolina 29201

Phone: (803) 400-1219  
Fax: (803) 779-9351  
[lawyer@paigebgeorge.com](mailto:lawyer@paigebgeorge.com)

On Saturday, January 14, 2023 at 10:40:35 AM EST, Andrew Lindemann <[andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)> wrote:

Karl and Paige:

I hope you are both doing well. I have a huge favor to ask. My initial brief is due on Tuesday, January 17<sup>th</sup>. I need to ask the Court of Appeals for an additional 15-day extension.

I have realized that I won't be able to meet that deadline. My wife had a death in the family this week and in fact I am heading to a funeral shortly. Plus, I am supposed to visit my

daughter in Alabama over the weekend. And I have another brief due in federal court on Tuesday. Would you kindly consent to a 15-day extension. I would appreciate the courtesy.

I'd like to get the motion filed over the weekend. If you get a chance, please reply as soon as possible.

Thanks.

Andrew

Andrew F. Lindemann  
Lindemann Law Firm, P.A.  
5 Calendar Court, Suite 202  
Post Office Box 6923  
Columbia, South Carolina 29260  
Direct Dial: 803-881-8921  
Email: [andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)

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**CERTIFICATE OF SERVICE**

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Pursuant to Section (d)(1) of the Supreme Court's Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended May 6, 2022), the undersigned employee of Lindemann Law Firm, P.A., counsel for the Appellant, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Appellant** in the above-captioned matter was made upon all counsel of record by email only this the 14th day of January 2023 as follows:

Paige B. George, Esquire  
Barry B. George, P.A.  
Email: [lawyer@paigebgeorge.com](mailto:lawyer@paigebgeorge.com)

Karl S. Brehmer, Esquire  
Brown & Brehmer  
Email: [ksb@brownandbrehmer.com](mailto:ksb@brownandbrehmer.com)

Lake E. Summers, Esquire  
Malone Thompson Summers & Ott, LLC  
Email: [summers@mtsolfirm.com](mailto:summers@mtsolfirm.com)

Robert D. Garfield, Esquire  
Crowe LaFave Garfield & Bagley, LLC  
Email: [robert@crowelafave.com](mailto:robert@crowelafave.com)

*s/ Andrew F. Lindemann*