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**Feb 01 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 five day extension of time until February 6, 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 February 1, 2023.

2. The undersigned counsel requires additional time to complete the Appellant's Initial Brief due to another brief due in this Court on the same date. In addition, the undersigned counsel's wife tested positive for COVID this morning which has impacted his ability to meet this deadline. The undersigned counsel also has an additional brief due in this Court on Friday, February 3, 2023, which is why five days are requested.

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 6, 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  
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Columbia, South Carolina 29260  
(803) 881-8920  
Email: andrew@ldlawsc.com

*Counsel for Appellant South Carolina  
Department of Social Services*

February 1, 2023

**From:** [Andrew Lindemann](#)  
**To:** [Jennifer Baker](#)  
**Subject:** FW: Sellaro Appeal (Time Sensitive)  
**Date:** Wednesday, February 1, 2023 4:12:28 PM

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**From:** Karl Brehmer <[ksb@brownandbrehmer.com](mailto:ksb@brownandbrehmer.com)>  
**Sent:** Wednesday, February 1, 2023 3:54 PM  
**To:** Andrew Lindemann <[Andrew@ldlawsc.com](mailto:Andrew@ldlawsc.com)>; Paige George <[lawyer@paigebgeorge.com](mailto:lawyer@paigebgeorge.com)>  
**Cc:** 'Lake Summers' <[summers@mtsolfirm.com](mailto:summers@mtsolfirm.com)>  
**Subject:** RE: Sellaro Appeal (Time Sensitive)

Ok by me.

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**From:** Andrew Lindemann <[Andrew@ldlawsc.com](mailto:Andrew@ldlawsc.com)>  
**Sent:** Wednesday, February 1, 2023 3:53 PM  
**To:** Karl Brehmer <[ksb@brownandbrehmer.com](mailto:ksb@brownandbrehmer.com)>; Paige George <[lawyer@paigebgeorge.com](mailto:lawyer@paigebgeorge.com)>  
**Cc:** 'Lake Summers' <[summers@mtsolfirm.com](mailto:summers@mtsolfirm.com)>  
**Subject:** Sellaro Appeal (Time Sensitive)  
**Importance:** High

Karl and Paige:

I regrettably have another favor to ask. I need to ask for another brief extension –I'd like 5 days. My wife got diagnosed with COVID this morning, which has upset my day to a good extent. I also had another brief due in the Court of Appeals which I am behind getting finished. I would appreciate the courtesy of another five days – to next Monday. I will obviously reciprocate for any extension needed for your response brief.

I plan to file the motion before 5:00 if possible. If one of you can respond ASAP, I'd much appreciate it.

Andrew

Andrew F. Lindemann  
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Email: [andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)

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

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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 1st day of February 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*

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\*Also Admitted in North Carolina

February 1, 2023

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**SC Court of Appeals**

**Via Email Only**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: Joseph P. Sellaro v. South Carolina Department of Social Services and the Richland County Sheriff's Department  
Appellate Case Number: 2022-001218  
Civil Action Number: 2018-CP-40-4835  
Claim Number: A3256  
Our File Number: 106.20585

Dear Ms. Kitchings:

Pursuant to Section (b)(2) of the Supreme Court's Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, please find enclosed for filing the **Motion for Extension of Time to File Initial Brief of Appellant** in the above referenced matter. In accordance with Section (d)(1) of this same Order, I am hereby serving copies on all counsel of record by email only. The Appellant South Carolina Department of Social Services is exempt from the filing fee.

If you have any questions, please advise.

Sincerely,

LINDEMANN LAW FIRM, P.A.



Andrew F. Lindemann

AFL/jmb  
Enclosure

cc: Paige B. George, Esquire (w/ Enclosure, Via Email Only)  
Karl S. Brehmer, Esquire (w/ Enclosure, Via Email Only)  
Lake E. Summers, Esquire (w/ Enclosure, Via Email Only)