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Jan 10 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Alison Renee Lee, Circuit Court Judge

Appellate Case No. 2022-000447
Case No. 2019-CP-40-1299

Christopher Shimeld, Appellant,

v.

Richland County Sheriff's Office, Respondent.

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

The Respondent Richland County Sheriff's Office respectfully moves this Court for an additional twenty-one day extension of time until February 3, 2023, by which to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

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

1. The Respondent's Initial Brief is currently due to be filed and served on January 13, 2023.

2. The undersigned counsel requires additional time to complete the Respondent'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, co-counsel is currently in trial in Federal Court.

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

WHEREFORE, the Respondent Richland County Sheriff's Office respectfully requests that it be allowed until February 3, 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

ROBERT D. GARFIELD #6557
CROW, LAFAVE, GARFIELD
& BAGLEY, LLC
2019 Park Street
Post Office Box 1149
Columbia, South Carolina 29202
(803) 999-1225
Email: robert@crowelafave.com

Counsel for Respondent

January 10, 2023

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CERTIFICATE OF SERVICE

The undersigned employee of Lindemann Law Firm, P.A., counsel for the Respondent, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Respondent** was made upon all counsel of record by email only this the 10th day of January 2023 as follows:

Joshua S. Kendrick, Esquire
Christopher S. Leonard, Esquire
Kendrick & Leonard, P.C.
Email: josh@kendrickleonard.com
Email: chris@kendrickleonard.com

Robert D. Garfield, Esquire
Crow, LaFave, Garfield & Bagley, LLC
Email: robert@crowlafave.com

s/ Andrew F. Lindemann

LINDEMANN LAW FIRM

Telephone (803) 881-8920
Facsimile (803) 862-1181

5 Calendar Court, Suite 202 (29206)
Post Office Box 6923
Columbia, South Carolina 29260

ANDREW F. LINDEMANN*
Direct Dial: (803) 881-8921
Email: andrew@ldlawsc.com

*Also Admitted in North Carolina

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Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

RE: Christopher Shimeld v. Richland County Sheriff's Office
Appellate Case Number: 2022-000447
Civil Action Number: 2019-CP-40-1299
Claim Number: 2019G00131
Our File Number: 314.20569

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 to File Initial Brief of Respondent** 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. I will mail the \$50.00 filing fee under separate cover.

If you have any questions, please advise.

Sincerely,

LINDEMANN LAW FIRM, P.A.



Andrew F. Lindemann

AFL/jmb
Enclosure

cc: Joshua S. Kendrick, Esquire (*w/ Enclosure, Via Email Only*)
Christopher S. Leonard, Esquire (*w/ Enclosure, Via Email Only*)
Robert D. Garfield, Esquire (*w/ Enclosure, Via Email Only*)