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Feb 16 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
DeAndrea Gist Benjamin, Circuit Court Judge

Appellate Case No. 2022-001469
Case No. 2020-CP-40-2839

South Carolina Public Interest Foundation and John Crangle, individually, and on behalf of all others similarly situated, Respondents,

v.

Richland County and Richland County Council, Appellants.

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

The Appellants respectfully move this Court for an additional fourteen day extension of time until March 3, 2023, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellants’ motion is based on the following grounds:

1. The Appellants' Initial Brief is currently due to be filed and served on February 17, 2023.

2. The undersigned counsel requires additional time to complete the Appellants' Initial Brief due to other commitments and deadlines including multiple briefs due in appellate courts in the past 10 days, two oral arguments before this Court on February 15, 2023, and the Supreme Court on February 9, 2023, and a trial scheduled to begin in Federal Court before Judge David Norton on February 21, 2023.

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

WHEREFORE, the Appellants respectfully requests that they be allowed until March 3, 2023, by which to file and serve their 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 Appellants

February 16, 2023

From: [James Carpenter](#)
To: [Andrew Lindemann](#)
Cc: [Jennifer Baker](#)
Subject: Re: SCPIF/Taylor v Richland County
Date: Thursday, February 16, 2023 9:47:25 AM

Sure, I'll consent.

I've been wanting to talk to you about how bad your client wants to appeal.

Jim

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From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Thursday, February 16, 2023 9:45:37 AM
To: James Carpenter <james.carpenter@carpenterlawfirm.net>
Cc: Jennifer Baker <Jennifer@ldlawsc.com>
Subject: SCPIF/Taylor v Richland County

Jim:

I have a favor to ask. My initial brief is due in this appeal tomorrow. I am running behind schedule because of other briefs, and I am starting a trial in federal court before Judge Norton next Tuesday which is getting much of my attention. Will you kindly consent to an additional 14-day extension? I would appreciate the courtesy.

I'd like to file this motion this morning, so if you can respond back to me quickly, I'd appreciate it.

Thanks.

Andrew

Andrew F. Lindemann
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CERTIFICATE OF SERVICE

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 Appellants, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Appellants** in the above-captioned matter was made upon all counsel of record by email only this the 16th day of March 2023 as follows:

James G. Carpenter, Esquire
The Carpenter Law Firm, P.C.
Email: james.carpenter@carpenterlawfirm.net

s/ Andrew F. Lindemann

LINDEMANN LAW FIRM

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

5 Calendar Court, Suite 202 (29206)
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February 16, 2023

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

*Also Admitted in North Carolina

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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

RE: South Carolina Public Interest Foundation and John Crangle, individually, and on behalf of all others similarly situated v. Richland County and Richland County Council
Appellate Case Number: 2022-001469
Civil Action Number: 2020-CP-40-2839
Our File Number: 314.20346

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 Appellants** 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 \$50.00 filing fee will be sent to the Court via U.S. Mail on today's date.

If you have any questions, please advise.

Sincerely,

LINDEMANN LAW FIRM, P.A.



Andrew F. Lindemann

AFL/jmb
Enclosure

cc: James G. Carpenter, Esquire (w/ Enclosure, Via Email Only)