

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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

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Opinion No. 27252  
(S.C. S.Ct. filed May 15, 2013)

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**RECEIVED**  
JUN 19 2013  
S.C. Supreme Court

The Town of Hollywood, ..... Appellant-Respondent,

v.

William Floyd a/k/a Jeff Floyd, Troy Readan and  
Edward McCracken a/k/a Eddie McCracken, ..... Respondents-Appellants.

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**MOTION FOR FURTHER EXTENSION  
AND TO FILE OUT OF TIME**

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The Appellant-Respondent Town of Hollywood respectfully moves this Court to grant an additional extension of time and to accept the filing of the Return to Petition for Rehearing out of time.

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

1. The Appellant-Respondent's Return to Petition for Rehearing was due

on Monday, June 17, 2013. The Appellant-Respondent is submitting the Return for filing on June 19, 2013.

2. The undersigned counsel for the Appellant-Respondent was unable to complete the preparation and drafting of the Return to Petition for Rehearing because of other obligations and because of time out of the office spent in addressing a family medical issue..

3. Thomas R. Goldstein, counsel for the Respondents-Appellants, has consented to this extension per the attached email.

WHEREFORE, the Appellant-Respondent respectfully requests that the Court grant an additional extension of time and accept the filing of the Return to Petition for Rehearing out of time.

DAVIDSON & LINDEMANN, P.A.

BY:



ANDREW F. LINDEMANN  
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Columbia, South Carolina 29202  
(803) 806-8222

*Counsel for Appellant-Respondent  
Town of Hollywood*

Columbia, South Carolina

June 19, 2013

**Jennifer M. Baker**

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**From:** Andrew Lindemann  
**Sent:** Wednesday, June 19, 2013 11:31 AM  
**To:** 'tgoldstein@cobblaw.net'  
**Subject:** RE: Town of Hollywood Appeal

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**From:** [tgoldstein@cobblaw.net](mailto:tgoldstein@cobblaw.net) [<mailto:tgoldstein@cobblaw.net>]  
**Sent:** Wednesday, June 19, 2013 11:31 AM  
**To:** Andrew Lindemann  
**Subject:** Re: Town of Hollywood Appeal

No! I will NOT consent to a three day extension. I will, however, consent to a 10 day extension. Don't ask for 3 days--you're just punishing yourself. Seriously, if all you want is 3 days, of course, but I'll consent to 10, 15, 20, 30. I never call time on lawyers. Our lives are too stressful to do that.

On June 19, 2013 at 11:06 AM Andrew Lindemann <[alindemann@DML-LAW.com](mailto:alindemann@DML-LAW.com)> wrote:

Tommy:

I need a favor. Will you kindly consent to an additional extension of three days for me to file the Return to the Petition for Rehearing? Please respond to this email with your consent because I need to provide the consent in writing to the Supreme Court.

Thanks.

Andrew

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**CERTIFICATE OF SERVICE**

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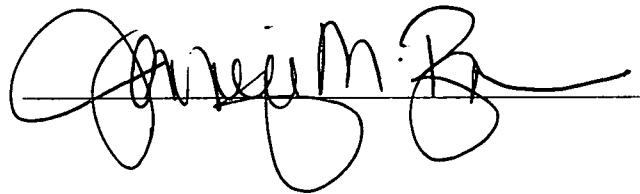
The undersigned employee of Davidson & Lindemann, P.A., attorneys for the Appellant-Respondent Town of Hollywood, does hereby certify that service of the below listed appeal documents was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 19th day of June 2013:

1. Motion for Further Extension and to File Out of Time
2. Return to Respondents-Appellants' Petition for Rehearing

Thomas R. Goldstein, Esquire  
Belk, Cobb, Infinger & Goldstein, P.A.  
Post Office Box 71121  
Charleston, South Carolina 29415-1121

Hugh W. Buyck, Esquire  
Buyck & Sanders, LLC  
Post Office Box 2424  
Mount Pleasant, South Carolina 29464

W. Andrew Gowder, Jr., Esquire  
Katie F. Monoc, Esquire  
Pratt-Thomas Walker, P.A.  
Post Office Drawer 22247  
Charleston, South Carolina 29413

A handwritten signature in black ink, appearing to read "W. Andrew Gowder, Jr.", written over a horizontal line. The signature is highly stylized and cursive.