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Apr 20 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 REPLY BRIEF OF APPELLANTS**

The Appellants respectfully move this Court for an additional ten-day extension of time until May 1, 2023, by which to file and serve their Initial Reply 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 Reply Brief is currently due to be filed and served on April 20, 2023.

2. The undersigned counsel requires additional time to complete the Appellants' Initial Reply Brief due to other commitments and deadlines including a date certain trial starting April 24, 2023 in the Lancaster County Court of Common Pleas as well as another brief due on April 20, 2023 in the Court of Appeals. The undersigned also had oral arguments in the South Carolina Supreme Court on April 19, 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 May 1, 2023, by which to file and serve their Initial Reply 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

April 20, 2023

From: [James Carpenter](#)
To: [Andrew Lindemann](#)
Cc: [Jennifer Baker](#)
Subject: Re: SCPIF/Taylor v Richland County
Date: Thursday, April 20, 2023 9:32:20 AM

I consent.

Also, when you can, get back to me on my settlement proposal on the Penny tax case.

Jim

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From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Thursday, April 20, 2023 7:30:44 AM
To: James Carpenter <james.carpenter@carpenterlawfirm.net>
Cc: Jennifer Baker <Jennifer@ldlawsc.com>
Subject: SCPIF/Taylor v Richland County

Jim:

I have a huge favor to ask. My initial reply brief is due in this appeal today. I am running behind schedule because of another brief due today and primarily because I am starting a trial in Lancaster County next week which is getting much of my attention. Will you kindly consent to an additional 10-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 certainly appreciate it.

Thanks.

Andrew

Andrew F. Lindemann
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Appellants.

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 Richland County and Richland County Council, does hereby certify that service of the **Motion for Extension to File Initial Reply Brief of Appellants** in the above-captioned matter was made upon Respondents’ counsel by email only this the 20th day of April 2023 as follows:

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

s/ Andrew F. Lindemann



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

5 Calendar Court, Suite 202 (29206)
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ANDREW F. LINDEMANN*
Direct Dial: (803) 881-8921
Email: andrew@ldlawsc.com

**Also Admitted in North Carolina*

April 20, 2023

RECEIVED
Apr 20 2023
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 Reply Brief of Appellants** in the above referenced matter. In accordance with Section (d)(1) of this same Order, I am hereby serving a copy 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*)