

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY FAMILY COURT

Appellate Case No. 2023-001376

Justin McGeeRespondent,

v.

Lindsay F. McGee.....Petitioner.

**Respondent’s Motion for Extension of Time to File Return to
Petitioner’s Amended Motion to Suppress Evidence**

Respondent Justin McGee requests a fifteen-day extension under Rule 240, SCACR to file his return to Petitioner’s Amended Motion to Suppress. The current deadline for the return is Monday, September 25, 2023. With the additional fifteen days, the proposed new deadline would be Tuesday, October 10, 2023. Petitioner’s counsel consents to the extension.

The grounds establishing good cause to grant this motion are:

1. Respondent’s undersigned counsel has conferred with counsel for Petitioner who has graciously agreed to consent to the extension, should it receive the Court’s approval.
2. By order of this Court dated September 14, 2023, all proceedings in the family court are stayed pending the Court’s resolution of Petitioner’s Amended Motion to Suppress. A Temporary Order was previously issued by the Family Court, so the status quo will remain in place during the extension period. As a result, no party would suffer any prejudice as the result of the extension.

3. Respondent's counsel is travelling internationally on vacation when the brief is scheduled to be due.¹

4. This is Respondent's second request for an extension of this deadline.

For the reasons set forth above, Respondent respectfully requests his deadline to file a return to Petitioner's Amended Motion be extended through Tuesday, October 10, 2023. Respondent asks that the Court hold any deadlines in abeyance pending resolution of this motion.

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Attorneys for Respondent Justin McGee

Columbia, South Carolina
September 21, 2023

¹ Back in March, undersigned counsel requested secured leave from September 25–29 and October 2–6, 2023 under the Supreme Court's Order Re: *Pilot Program for the Designation of Secure Leave Periods by Lawyers*, No. 2022-11-16-01 (S.C. Sup. Ct. filed Nov. 16, 2022) to travel internationally for his tenth wedding anniversary.

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Proof of Service

I, the undersigned partner of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Respondent Justin McGee, certify that I have served all parties in this action with a copy of the document(s) set forth below by email:

Document(s): **Respondent’s Motion for an Extension**

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