

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Case No.: 2023-000500

The School of Hope Christian  
Academy, Jacqueline McKie  
Burden, and Eugene Burden,  
Sr., APPELLANTS,

vs.

South Carolina Department of  
Education, Ronald Jones, and  
Shirley Jenerette,  
RESPONDENTS.

MOTION REQUESTING EXTENSION OF TIME

Appellants, through the undersigned counsel, hereby move the Court for a thirty-day extension of time to file the Initial Brief. Since receiving the transcript, the undersigned has been in Federal Court (District of South Carolina) several days on an appointed criminal case. The undersigned counsel is also currently scheduled for a weeklong trial to begin October 2<sup>nd</sup> in an appointed statutory rape case in Guilford County (North Carolina) Superior Court. Due to these scheduling issues, counsel hereby requests a thirty-day extension to file the Initial Brief and Designation of Matter to be included in the Record on Appeal.

Counsel for each Respondent has indicated that he has no objection to the requested extension. If the requested extension is granted, the Appellants' Initial Brief would be due on October 25, 2023.

September 25, 2023

Respectfully submitted,  
Duncan and Heydary Law, PLLC.

s/W. Michael Duncan  
W. Michael Duncan (SC Bar # 0001162)  
2411 Pineview Drive  
Greensboro, North Carolina 27407  
(803) 315-4500  
[Mike.duncan@duncanandheydaryl.com](mailto:Mike.duncan@duncanandheydaryl.com)  
Attorney for Appellants

RECEIVED

Sep 25 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Appellate Case No.: 2023-000500

The School of Hope Christian  
Academy, Jacqueline McKie  
Burden, and Eugene Burden,  
Sr., APPELLANTS

vs.

South Carolina Department of  
Education, Ronald Jones, and  
Shirley Jenerette,  
RESPONDENTS.

PROOF OF SERVICE

I certify that I have served the Motion Requesting an Extension of Time on the three Respondents listed above by electronic filing to their respective counsel at the email addresses listed below which appear in the AIS system for the South Carolina Bar Association. The electronic filing was made on September 25, 2023.

Duncan and Heydary Law, PLLC.

September 25, 2023

s/W. Michael Duncan  
W. Michael Duncan (SC Bar # 0001162)  
2411 Pineview Drive  
Greensboro, North Carolina 27407  
(803) 315-4500  
[Mike.duncan@duncanandheydaryl.com](mailto:Mike.duncan@duncanandheydaryl.com)  
Attorney for Appellants

Other Counsel of Record:  
Attorney for Respondent SC Department of Education  
Vordman C. Traywick, III  
Robinson Gray Stepp and Laffitte. LLC

Post Office Box 11449  
Columbia, South Carolina 29211  
(803) 231-7810  
[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)

Attorney for Respondent Ronald Jones  
Albert R. Pierce, Jr.  
Howser, Newman & Besley, LLC  
Post Office Box 12009  
Columbia, South Carolina 29211  
(803) 758-6000  
[rpierce@hnblaw.com](mailto:rpierce@hnblaw.com)

Attorney for Respondent Shirley Jenerette  
Page M. Kalish  
PMK Law, LLC  
141 Pelham Drive  
Ste. F, 202  
Columbia, South Carolina 29209  
(803) 386-7644  
[pmk@pmklawllc.com](mailto:pmk@pmklawllc.com)