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Nov 27 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

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Case No.: 2023-000500

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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.

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MOTION REQUESTING EXTENSION OF TIME

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Appellants, through the undersigned counsel, hereby move the Court for a twenty (20) day extension of time to file the Initial Brief. Since this Court granted an extension until November 28, 2023, the undersigned has continued to have more responsibilities than anticipated as Personal Representative in Fairfield County, South Carolina for a client and close friend who died on October 12<sup>th</sup>. The undersigned counsel has also had a particularly busy Court schedule in November with several court appointed criminal cases. In particular, this week counsel is representing an incarcerated client in a criminal jury trial in an appointed case in Guilford County Superior Court which has required and continues to require extensive time.

Due to these time constraints, the undersigned requests a twenty-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 Monday, December 18, 2023.

Respectfully submitted,  
Duncan and Heydary Law, PLLC.

s/W. Michael Duncan  
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Attorney for Appellants

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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 November 27, 2023.

Duncan and Heydary Law, PLLC.

November 27, 2023

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