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SC Court of Appeals
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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT
S. Phillip Lenski, Administrative Law Judge

Appellate Case No. 2023-001768
Trial Court Case No. 23-ALJ-30-0239-AP

Palmetto Youth Academy Charter School and Palmetto Youth Services, Inc.,.....

.....Appellant.

v.

Florence County School District One,.....Respondent.

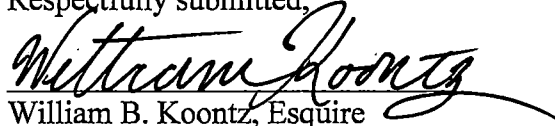
MOTION FOR EXTENSION OF TIME TO FILE INITIAL APPELLANT’S BRIEF

Pursuant to Rule 240, SCACR, the Appellant requests a 30-day extension of the deadline for filing their initial Appellant’s Brief and Designation of Matter to be included in the record of this appeal. The current deadline is December 29, 2023. This is the first request for an extension of this deadline.

Under Rule 207, SCACR, the timeline for the initial brief of Appellant is due thirty (30) days following receipt of the transcript. Counsel for the Appellant requested the transcript on November 22, 2023, and believed the timeline for the initial brief pursuant to Rule 208 had not yet begun to run. However, counsel for the Appellant discovered on the evening of January 4, 2024, that he had received the transcript by e-mail on November 29, 2023, as an attachment to the e-mail with the invoice and payment request. Therefore, the deadline for the initial brief

began to run as of November 29, 2023, and would be due on December 29, 2023.

Respectfully submitted,



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January 5, 2024

Attorneys for Appellant

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Palmetto Youth Academy Charter School and Palmetto Youth Services, Inc.,.....
.....Appellant.

v.

Florence County School District One,.....Respondent.

PROOF OF SERVICE

I certify that I have served a copy of the *Motion for Extension of Time to File Initial Appellant's Brief* on the following as indicated herein below, by mailing or emailing a copy of the same on January 5, 2024, at the following addresses:

Johnny E. Watson, Esquire
jewatson.lwr@gmail.com
Watson Law Firm
Columbia, SC

Michael H. Montgomery, Esquire
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Montgomery Willard, LLC
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s/ John S. Nichols
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Attorneys for Appellant

January 5, 2024

William Koontz

From: William Koontz
Sent: Friday, January 5, 2024 3:40 PM
To: mhm@montgomerywillard.com; jewatson.lwr@gmail.com
Cc: Lindsey Price; John Nichols
Subject: Palmetto Youth Academy Charter School and Palmetto Youth Services, Inc. v. Florence County School District One (Case No.: 23-AJ-30-0239-AP)
Attachments: 2024.01.05.Letter Filing Mtn Extension and Attach.pdf

Dear Mr. Montgomery and Mr. Watson,

I have enclosed a digital copy of the Motion for Extension to File Appellant's Initial Brief that will be filed this afternoon with the Court of Appeals along with the proof of service. Please do not hesitate to reach out if you have any questions.

Best regards,
William Koontz



Listening. Lawyering. Leading.

WILLIAM B. KOONTZ, ESQ.

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January 5, 2024

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED

JAN 05 2024

SC Court of Appeals

RE: Palmetto Youth Academy Charter School and Palmetto Youth Services, Inc. v.
Florence County School District One
Appellate Case No.: 2023-001768


Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of a Motion for Extension of Time to File Initial Appellant's Brief in this case. I have also enclosed the following:

- 1.) A filing fee of \$50.00;
- 2.) Proof of Service of the Motion on counsel of record.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



John S. Nichols, Esq.

Bluestein Thompson Sullivan, LLC

JSN/wbk

Enclosures

cc: Johnny E. Watson, Sr., Esquire
Michael H. Montgomery, Esquire