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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Frank R. Addy, Jr., Circuit Court Judge

Case No. 2012-CP-32-3208

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SC Court of Appeals

Raymond Carter, Appellant,

v.

Donnie Myers, Solicitor, Lexington County; Tracey Carroll,
Assistant Solicitor, Lexington County; Brian Buck, Irmo
Police Department; Scott Franklin, Irmo Police Department;
Timothy E. Stephenson, South Carolina Law Enforcement (SLED);
George White, Ex father-in-law; Tammy Carter, (AKA Tammy Scrogam),
Ex-wife; Barbara Keadle (AKA Diane Hinkle) Investigator LDSS;
Francis Ross, LDSS; Paulette Jolly, Guardian ad Litem, in their
official and individual capacities, Defendants,

Of whom, Brian Buck, Irmo Police Department and Scott Franklin,
Irmo Police Department, are, Respondents.

**MOTION FOR EXTENSION TO FILE
INITIAL BRIEF AND DESIGNATION OF
MATTER TO BE INCLUDED IN THE
RECORD ON APPEAL**

The Respondents, Brian Buck, Irmo Police Department and Scott Franklin, Irmo Police
Department, respectfully move for an extension of time until August 7, 2013, in which to file and
serve their Initial Brief and Designation of Matter to be included in the Record on Appeal. This

Motion is based upon the following grounds:

1. On June 12, 2013, Appellant served his Initial Brief by mail. He did not serve his Designation of Matter to be Included in the Record.
2. Appellant served his Designation of Matter to be Included in the Record on Appeal on June 26, 2013.
3. On July 8, 2013, Appellant served a Motion to Allow Late Filings. Included in that filing was a “corrected version of the Designation of Matter and the Appellant Initial Brief that are now in proper form pursuant to SCACR Rule 267(a).”
4. Based upon the July 8th “corrected” filing, counsel for these Appellees calculated a due date for these Respondent’s Initial Brief for August 7, 2013, and diaried the response accordingly.
5. In response to a filing by counsel for Respondent Myers, the Clerk of Court advised by way of letter dated July 19, 2013, that the filing of the Motion by Appellant did not stay the filing deadlines. Counsel for these Respondents continued to believe that the deadline for the Initial Brief was not stayed, but was calculated from the service date of July 8, 2013, of the “corrected” filing.
6. Counsel for these Respondents has now learned that Initial Brief was due 30 days from the initial filing by Appellant on June 12, 2013.

WHEREFORE, the Respondents, Chief Brian Buck of the Irmo Police Department and Scott Franklin, formerly of the Irmo Police Department, respectfully request an extension of time until August 7, 2013, the date originally diaried based upon the service of the “corrected” Brief,

in which to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

MORRISON LAW FIRM, LLC

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ATTORNEYS FOR THE DEFENDANTS
CHIEF BRIAN BUCK AND SCOTT FRANKLIN

Columbia, South Carolina

August 2, 2013

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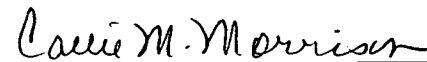
Of whom, Brian Buck, Irmo Police Department and Scott Franklin,
Irmo Police Department, are, Respondents.

CERTIFICATE OF SERVICE

The undersigned employee of Morrison Law Firm, LLC, attorney for the Defendants, Chief Brian Buck and Scott Franklin, does hereby certify that service of the **Motion for Extension to File Initial Brief and Designation of Matter to be Included in the Record on Appeal** in the above-captioned action was made upon Plaintiff and all counsel of record by placing same in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 2nd day of August, 2013, addressed as follows:

Mr. Raymond W. Carter
2219 Leesburg Road
Columbia, SC 29209

Andrew F. Lindemann, Esquire
Post Office Box 8568
Columbia, SC 29202



Callie M. Morrison

Columbia, South Carolina