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**Mar 18 2024**

**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

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 TO ALLOW LATE FILING

Appellants, through the undersigned counsel, hereby move the Court to allow the late filing of its Initial Brief and Designation of Matter to be Included in the Record on Appeal. This Court issued a letter on March 6, 2024 setting a March 18, 2024 deadline for filing and counsel for Appellants is submitting the Initial Brief and Designation of Matter in accordance with that letter.

As noted in a prior Motion, the hospitalization in late January 2024 of counsel's 88-year-old father-in-law after a fall and breaking his pelvis, took counsel away from work for a period of time and has delayed the preparation and filing of the Initial Brief.

Based on the above circumstances, the undersigned respectfully requests that the Court accept the filing of the Initial Brief and Designation of Matter.

Respectfully submitted,  
Duncan and Heydary Law, PLLC.

s/W. Michael Duncan  
W. Michael Duncan (SC Bar # 0001162)  
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March 18, 2024