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Apr 12 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable B. Alex Hyman

Case No. 2020-CP-22-00356
Appellate Case No. 2023-001454

Ron Christmas, Appellant,

v.

County of Georgetown; City of Georgetown; and South Carolina Department of Transportation,
Respondents.

**APPELLANT’S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to the South Carolina Appellate Court Rules (“SCACR”), Appellant Ron Christmas (“Appellant”) respectfully moves for an order extending the time to file his Initial Brief and Designation of Matter by thirty (30) days. The current deadline for filing Appellant’s Initial Brief and related materials is April 19, 2024. With a 30-day extension of time, the new deadline would be Monday, May 20, 2024.

Appellant requires additional time for briefing due to the undersigned’s continued work concerning the accuracy of the amended transcript, in addition to counsel’s workload that includes time-sensitive filings in other cases before this Court and the State’s circuit courts.

This is Appellant's first motion for an extension of time to file his Initial Brief and Designation of Matter. Appellant previously moved to stay briefing in this case pending editing of the transcript after noting alleged material errors. In his motion to stay, Appellant requested, *inter alia*, that the Court stay briefing without prejudice to the Court's standard briefing extensions for attorney workload. The Court granted the motion to stay and, in its order, set the current deadline for filing Appellant's Initial Brief and Designation of Matter: April 19, 2024.

Appellant consulted with opposing counsel prior to filing this motion and Respondents consent to the grant of the relief requested herein.

THEREFORE, Appellant moves this Court for an Order extending the deadline to file his Initial Brief and Designation of Matter by thirty days to Monday, May 20, 2024.

Respectfully submitted,

JUSTIN O'TOOLE LUCEY, P.A.

By: /s/Justin O'Toole Lucey

Justin O'Toole Lucey

Joshua F. Evans

Sohayla R. Townes (S.C. Bar No. 102814)

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Attorneys for Appellant

April 12, 2024
Mount Pleasant, SC

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Ron Christmas, Appellant,

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PROOF OF SERVICE

I, the undersigned, attorney for Appellant Ron Christmas, do hereby certify that I have this date served the foregoing **APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER** by personally serving the same upon the following counsel using the primary email addresses as listed via the Attorney Information System on April 12, 2024.

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April 12, 2024

VIA FEDEX

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

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SC Court of Appeals

Re: *Ron Christmas v. County of Georgetown, et al.*
Appellate Case No. 2023-001454
Circuit Court Case No.: 2020-CP-22-00356

Dear Ms. Kitchings:

Please find enclosed a check in the amount of \$50.00, which represents the required filing fee for the *Motion for Extension of Time to File Initial Brief and Designation of Matter* filed by Appellant on April 12, 2024, in the above-referenced matter.

Should you have any questions or concerns, please do not hesitate to contact me.

Best regards,



Lee Weiland
Senior Paralegal

Enclosure
cc: All Counsel of Record