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Apr 12 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Appellate Case No. 2023-000500

The School of Hope Christian Academy, Jacqueline McKie Burden,
and Eugene Burden, Sr.,.....Appellants,

v.

South Carolina Department of Education, Ronald Jones,
and Shirley Jenerette,Respondents.

**RESPONDENTS’ JOINT MOTION FOR AN EXTENSION TO FILE
INITIAL BRIEFS OF RESPONDENTS AND DESIGNATION OF MATTER**

Pursuant to Rule 263(b), SCACR, Respondents South Carolina Department of Education, Ronald Jones, and Shirley Jenerette, by and through the undersigned counsel, respectfully request a 30-day extension of the April 18, 2024 deadline by which Respondents must file their Initial Briefs and Designation of Matter. The basis for this request is that the undersigned counsel have additional pressing court deadlines, including filings in appeals pending in this Court as well as in state courts and federal courts. Further, counsel for Respondents wish to coordinate their initial briefs—where possible—to streamline the issues and ensure judicial economy, which requires additional time. With this extension, Respondents’ Initial Briefs and Designation of Matter would be due on May 20, 2024. This is Respondents’ first request for an extension of the deadline.

For good cause shown, counsel for Respondents therefore respectfully request that the Court grant this motion for a 30-day extension to file their Initial Briefs and Designation of Matter. The undersigned consulted with counsel for Appellants prior to filing this motion, and they do not oppose this request.

Respectfully submitted,

/s/ Sarah C. Frierson

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Columbia, South Carolina
April 12, 2024

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PROOF OF SERVICE

Pursuant to Rule 262(c)(3), SCACR, I, the undersigned, Counsel for Respondent South Carolina Department of Education, certify that I have served Respondents' Joint Motion for an Extension to File Initial Briefs of Respondents and Designation of Matter on the following counsel of record by email on April 12, 2024.

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(Signature Page Follows)

Respectfully submitted,

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*Counsel for Respondent South Carolina Department
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Columbia, South Carolina

April 12, 2024

From: [Sarah Frierson](#)
To: [Mike Duncan](#)
Cc: [Lisle Traywick](#); [Page Kalish](#); [Rick Pierce](#); [Toni Hawkins](#)
Bcc: {F443413}.Clients@f8eed.imanage.work
Subject: School of Hope v. S.C. Dep't of Edu. (Appellate Case No. 2023-000500) Respondents" Joint Motion for Extension to File Initial Briefs and Designation of Matter
Date: Friday, April 12, 2024 10:05:02 AM
Attachments: [image001.png](#)
[image008.png](#)
[Respondents" Joint Motion for First Extension of Time to File Respondents" Initial Briefs and DOM\(39110616.1\).pdf](#)
[Proof of Service of Respondents" Joint Motion for First Extension of Time to File Respondents" Initial Briefs and DOM\(39110604.1\).pdf](#)

Good morning, Mike,

Pursuant to Rules 240 and 263(b), SCACR, and *In re Methods of Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended May 6, 2022)*, App. No. 2020-000447, Order No. 2022-05-06-03, ¶ (d)(1) (S.C. Sup. Ct. filed May 6, 2022), attached for service upon you is Respondents' Joint Motion for an Extension to File Initial Briefs of Respondents and Designation of Matter being filed in the South Carolina Court of Appeals today.

Should you have any questions or concerns, please don't hesitate to contact us. Thank you.

Best Regards,

Sarah Frierson



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