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May 01 2024

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas**

Appellate Case No. 2023-001360

Case No. 2022-CP-42-01677

Taylor Chasey Robertson

Appellant,

v.

South Carolina Department of Public
Safety, South Carolina Highway
Patrol, and Patrick J. Goshorn,

Respondents.

**MOTION FOR EXTENSION OF TIME FOR APPELLANT
TO SERVE AND FILE RETURN TO RESPONDENTS' MOTION TO STRIKE**

Pursuant to Rule 240, SCACR, appellant Taylor Chasey Robertson moves for an extension of time in which to serve and file appellant's Return to Respondent's Motion to Strike. Robertson requests an extension of ten or more days to file the Return which is currently due May 3, 2024. This is the first request for an extension filed by Robertson as to this particular Motion, and the second overall.

The grounds for this motion are that other impending professional matters and obligations have created a need for additional time to prepare the Return to Respondent's Motion to Strike. A ten-day delay will not prejudice the rights of any of the parties. We have notified

counsel for the Respondents, Russell W. Harter, Jr. and Stephanie H. Burton, of our intent to file this motion. Ms. Burton has affirmatively informed the undersigned that there is no objection to this Motion. Granting this motion would require the Return to Respondent's Motion to Strike to be filed with the Court no later than May 13, 2024.

For these reasons, Robertson requests an extension of the deadline for filing and serving the Initial Brief and Designation of Matter until May 13, 2024.

Dated this 1st day of May, 2024

s/Nicolas J. Baughman
Nicolas J. Baughman, Esq.
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v.

South Carolina Department of Public Safety, South Carolina Highway Patrol,
and Trooper Patrick J. Goshorn, Respondents,

PROOF OF SERVICE

I certify that I have served the MOTION FOR EXTENSION OF TIME FOR APPELLANT TO SERVE AND FILE RESPONDENT’S MOTION TO STRIKE on South Carolina Department of Public Safety, South Carolina Highway Patrol, and Trooper Patrick J. Goshorn electronically by email to their attorneys of record to their email addresses listed below on May 1, 2024.

Russell W. Harter, Esq.
Stephanie H. Burton

rwhjr@chhlaw.net
sburton@gibbesburton.com

May 1, 2024

Respectfully Submitted,

s/ Nicolas J. Baughman

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