

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals  
\_\_\_\_\_  
APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

**RECEIVED**  
**May 13 2024**  
SC Court of Appeals

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 SECOND 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 May 20, 2024. With a 30-day extension of time, the new deadline would be Wednesday, June 19, 2024.

Appellant requires additional time for briefing due to the undersigned’s workload that includes time-sensitive filings in other cases before this Court and the State’s circuit courts.

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 Wednesday, June 19, 2024.

Respectfully submitted,

JUSTIN O'TOOLE LUCEY, P.A.

By: /s/Justin O'Toole Lucey  
Justin O'Toole Lucey (S.C. Bar No. 15438)  
Joshua F. Evans (S.C. Bar No. 77448)  
Sohayla R. Townes (S.C. Bar No. 102814)  
415 Mill Street  
Mount Pleasant, SC 29464  
Telephone: (843) 849-8400  
*Attorneys for Appellant*

May 13, 2024  
Mount Pleasant, SC

**RECEIVED**  
**May 13 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.

\_\_\_\_\_  
PROOF OF SERVICE  
\_\_\_\_\_

I, the undersigned, attorney for Appellant Ron Christmas, do hereby certify that I have this date served the foregoing **APPELLANT’S SECOND 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 May 13, 2024.

Counsel of Record

M. Kirk Battle, Esq.  
Michael W. Battle, Esq.  
Battle Law Firm, LLC  
P.O. Box 530  
Conway, SC 29528

[kbattle@battlelawsc.com](mailto:kbattle@battlelawsc.com)

[mbattle@battlelawsc.com](mailto:mbattle@battlelawsc.com)

*Attorneys for County of Georgetown*

Andrew F. Lindemann, Esq.  
Lindemann Law Firm, P.A.  
P.O. Box 6923  
Columbia, SC 29260  
[andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)  
*Attorney for City of Georgetown*

Lisa A. Thomas, Esq.  
Carmen V. Ganjehsani, Esq.  
Richardson Plowden  
Office: 2103 Farlow Street  
Myrtle Beach, SC 29577  
Mailing Address: P.O. Box 3646  
Myrtle Beach, SC 29578  
[lthomas@richardsonplowden.com](mailto:lthomas@richardsonplowden.com)  
[cganjehsani@richardsonplowden.com](mailto:cganjehsani@richardsonplowden.com)  
*Attorneys for South Carolina Department of Transportation*

JUSTIN O'TOOLE LUCEY, P.A.

*s/Justin Lucey*  
Justin O'Toole Lucey (S.C. Bar No. 15438)  
Joshua F. Evans (S.C. Bar No. 77448)  
Sohayla R. Townes (S.C. Bar No. 102814)  
415 Mill Street  
Mount Pleasant, SC 29464  
*Attorneys for Appellant*

May 13, 2024  
Charleston, South Carolina