

**RECEIVED**

**Jun 04 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM BARNWELL COUNTY  
In the Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge  
Clifton B. Newman, Circuit Court Judge

---

Lower Court Case No. 2013-CP-06-0059  
Appellate Case No. 2019-000599

---

Lorenda Robinson, Elaine Nix, Archie Patterson,  
And Tami Bollerman, ..... Plaintiffs,

Of Whom, Archie Patterson and Tami Bollerman are the Respondents,

v.

South Carolina Department of Employment and  
Workforce, ..... Appellant.

---

**MOTION FOR EXTENSION OF TIME TO FILE  
REPLY IN SUPPORT OF PETITION FOR REHEARING**

---

Respondents Archie Patterson and Tami Bollerman respectfully move this Court for an extension of their deadline to file a Reply in support of their Petition for Rehearing through June 14, 2024. This deadline is currently June 10, 2024, and this is Respondents first request for an extension of this deadline. Respondents have consulted with opposing counsel concerning this request and have been advised that they consent.

Respectfully submitted,

June 4, 2024  
Columbia, South Carolina

s/ Adam Protheroe

Adam Protheroe (SC Bar #78442)  
Susan B. Berkowitz (SC Bar #00670)  
S.C. Appleseed Legal Justice Center  
PO Box 7187  
Columbia, SC 29202  
(803) 779-1113  
adam@scjustice.org  
sberk@scjustice.org

Daniel W. Williams (SC Bar #10233)  
BEDINGFIELD & WILLIAMS, LLC  
40 Wall Street  
PO Box 616  
Barnwell, SC 29812  
(803) 259-2759  
dan@danwilliamslaw.com

C. Bradley Hutto (SC Bar #6436)  
WILLIAMS & WILLIAMS  
1281 Russell Street  
PO Box 1084  
Orangeburg, SC 29115  
(803) 380-4099  
cbhutto@williamsattys.com

Alex D. Pattera (SC Bar #75004)  
THE PATERRA LAW FIRM, LLC  
104 S. Calhoun Street  
Greenville, SC 29601  
(864) 232-2776  
Alex.pattera@paterrallaw.com

*Counsel for Respondents*  
*Archie Patterson and Tami Bollerman*

**RECEIVED**

**Jun 04 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM BARNWELL COUNTY  
In the Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge  
Clifton B. Newman, Circuit Court Judge

---

Lower Court Case No. 2013-CP-06-0059  
Appellate Case No. 2019-000599

---

Lorenda Robinson, Elaine Nix, Archie Patterson,  
And Tami Bollerman, ..... Plaintiffs,

Of Whom, Archie Patterson and Tami Bollerman are the Respondents,

v.

South Carolina Department of Employment and  
Workforce, ..... Appellant.

---

**CERTIFICATE OF SERVICE**

---

I certify that I have served the Respondents MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF THEIR PETITION FOR REHEARING on the South Carolina Department of Employment and Workforce by E-mail to their counsel of record pursuant to *Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended May 6, 2022)*, Appellate Case No. 2020-000447 on **June 4, 2024**.

Robert E. Tyson, Jr. - rtyson@robinsongray.com

Vordman Carlisle Traywick, III - ltraywick@robinsongray.com

William H. Davidson, II - wdavidson@DML-LAW.com

Kenneth P. Woodington - kwoodington@DML-LAW.com

Robert E. Stepp - rstepp@robinsongray.com

June 4, 2024  
Columbia, South Carolina

s/ Adam Protheroe

Adam Protheroe (SC Bar #78442)  
Susan B. Berkowitz (SC Bar #00670)  
S.C. Appleseed Legal Justice Center  
PO Box 7187  
Columbia, SC 29202  
(803) 779-1113  
adam@scjustice.org  
sberk@scjustice.org

Daniel W. Williams (SC Bar #10233)  
BEDINGFIELD & WILLIAMS, LLC  
40 Wall Street  
PO Box 616  
Barnwell, SC 29812  
(803) 259-2759  
dan@danwilliamslaw.com

C. Bradley Hutto (SC Bar #6436)  
WILLIAMS & WILLIAMS  
1281 Russell Street  
PO Box 1084  
Orangeburg, SC 29115  
(803) 380-4099  
cbhutto@williamsattys.com

Alex D. Pattera (SC Bar #75004)  
THE PATERRA LAW FIRM, LLC  
104 S. Calhoun Street  
Greenville, SC 29601  
(864) 232-2776  
Alex.pattera@paterrallaw.com

*Counsel for Respondents*  
*Archie Patterson and Tami Bollerman*

## Motion for Extension of Time to File Reply in Support of PFR

Adam Protheroe <adam@scjustice.org>

Tue 2024-06-04 12:25 PM

To: Rob Tyson (Other) <rtyson@robinsongray.com>; kwoodington@DML-LAW.com <kwoodington@DML-LAW.com>; ltraywick@robinsongray.com <ltraywick@robinsongray.com>; rstepp@robinsongray.com <rstepp@robinsongray.com>; w davidson@DML-LAW.com <wdavidson@DML-LAW.com>  
Cc: dan@danwilliamsllaw.com <dan@danwilliamsllaw.com>; Brad Hutto <cbhutto@williamsattys.com>; Sue Berkowitz <SBerk@scjustice.org>; 'Alexander Pattera' <alex.pattera@paterralaw.com>  
Bcc: Patterson v. DEW - E-Mail Log <a.c.868838u4t.u-57058867.98850ea8-8e6c-46c2-a66e-ddd1045d0207@tasks.clickup.com>; a.c.8688nh6v1.u-57058867.cbf32a20-06b9-494d-8b89-a5293a415e43@tasks.clickup.com <a.c.8688nh6v1.u-57058867.cbf32a20-06b9-494d-8b89-a5293a415e43@tasks.clickup.com>

 1 attachments (73 KB)

2024 06 04 - Motion for Extension re Reply ISO PER\_FINAL.pdf;

Good afternoon,

I hope you all are well. Please find attached and served upon you Respondents' Motion for Extension of Time to File a Reply in Support of their Petition for Rehearing. This document is being served electronically pursuant to *Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024)*, Appellate Case No. 2020-000447.

Please don't hesitate to contact me if you have any questions.

Thanks,  
Adam

**Adam Protheroe**(he/him)  
**Litigation Attorney**  
**S.C. Appleseed Legal Justice Center**  
P.O. Box 7187  
Columbia, S.C. 29202  
Cell – (803) 816-0607  
Fax – (803) 779-5951  
[www.scjustice.org](http://www.scjustice.org)

**This e-mail may contain privileged or confidential information. No privilege is waived by inadvertent transmission. If you are not the intended recipient, please 1) delete this e-mail and any attachments, 2) destroy any copies that may have been made, 3) do not use, copy, or distribute the contents in any form, and 4) notify the sender by return e-mail or phone.**