

RECEIVED

Jun 27 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 FOURTH 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 ten (10) days. The current deadline for filing Appellant’s Initial Brief and related materials is July 1, 2024. With a 10-day extension of time, the new deadline would be Thursday, July 11, 2024.

Appellant seeks one last and final extension for the following reasons:

1. Counsel’s current workload and preparing for upcoming motion hearings and time-sensitive filings in this Court, the Supreme Court, and the Court of Common Pleas;
2. the first 30-day extension was mostly used to continue reconciling the inaccurate transcript and revisions thereto, and we had respectfully requested that first extension not be counted against Appellant;

3. one trial counsel has been on vacation during much of the current 10-day extension;
4. the dedicated paralegal on this file had a family emergency, in addition to caring for a family member post medical procedure, this current week and on family vacation all next week; and,
5. all firm staff are on holiday June 28, July 4, and July 5.

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 10 days to Thursday, July 11, 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

June 27, 2024
Mount Pleasant, SC

RECEIVED

Jun 27 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 FOURTH 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 June 27, 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

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
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
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

June 27, 2024
Charleston, South Carolina

JUSTIN O'TOOLE LUCEY, PA

Attorneys at Law

Justin Lucey
Joshua F. Evans
Stephanie D. Drawdy
Dabny Lynn
Anna S. McCann

415 Mill Street, Mount Pleasant, SC 29464
Reply to: P.O. Box 806, Mount Pleasant, SC 29465
Phone: 843.849.8400 · office@lucy-law.com

Sohayla R. Townes
Mandee N. Funai
Charlotte B. Winckler
Alexandra S. O'Neill

June 27, 2024

VIA FEDEX

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

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 *Appellant's Fourth Motion for Extension of Time to File Initial Brief and Designation of Matter* filed by Appellant on June 27, 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

RECEIVED

Jun 27 2024

SC Court of Appeals