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**Jul 02 2024**

**SC Court of Appeals**

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

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

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Appellate Case No. 2023-001360

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Case No. 2022-CP-42-01677

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Taylor Chasey Robertson

Appellant,

v.

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

Respondents.

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**MOTION FOR EXTENSION OF TIME FOR APPELLANT  
TO SERVE AND FILE REPLY BRIEF**

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Pursuant to Rule 240, SCACR, appellant Taylor Chasey Robertson moves for an extension of time in which to serve and file appellant's Reply Brief. Robertson requests an extension of thirty days to file the Reply Brief which is currently due July 12, 2024. This is the first request for an extension filed by Robertson as to the Reply Brief, and the third overall.

The grounds for this motion are that Appellant's counsel has a previously scheduled, paid for, and circuit court-protected family vacation scheduled for July 6 through July 20. Additionally, Appellant's counsel has other impending professional matters and obligations that create a need for additional time to prepare the Reply Brief. A delay of this nature 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. Mr. Harter has affirmatively informed the undersigned that Respondents CONSENT to this Motion. Granting this motion would require the Reply Brief to be filed with the Court no later than August 11, 2024.

For these reasons, Robertson requests an extension of the deadline for filing and serving the Reply Brief until August 11, 2024.

Dated this 2nd day of July, 2024

*s/Nicolas J. Baughman*  
Nicolas J. Baughman, Esq.  
Nicolas J. Baughman, Attorney at Law, LLC  
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Attorney for Appellant

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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 REPLY BRIEF** 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 July 2, 2024.

Russell W. Harter, Esq.  
Stephanie H. Burton

[rwhjr@chhlaw.net](mailto:rwhjr@chhlaw.net)  
[sburton@gibbesburton.com](mailto:sburton@gibbesburton.com)

July 2, 2024

Respectfully Submitted,

s/ Nicolas J. Baughman

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