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**Jul 15 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Case No.: 2023-000500

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The School of Hope Christian  
Academy, Jacqueline McKie  
Burden, and Eugene Burden,  
Sr., APPELLANTS,

vs.

South Carolina Department of  
Education, Ronald Jones, and  
Shirley Jenerette,  
RESPONDENTS.

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**MOTION TO ALLOW LATE FILING**

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Appellants, through the undersigned counsel, hereby move the Court to allow the late filing of the Record on Appeal and its Final Brief which are attached hereto. This Court issued a letter dated July 3, 2024, setting a deadline for July 15, 2024, for filing and counsel for Appellants is submitting the Record on Appeal and Final Brief in accordance with that letter.

As noted in a prior Motion, the hospitalization and convalescence of counsel's 88-year-old father-in-law after a fall and breaking his pelvis, took counsel away from work for a substantial period in 2024 and has delayed the preparation and filing of the Record on Appeal and Final Brief. In addition, since receiving the July 3<sup>rd</sup> letter from this Court, counsel was in a jury trial on a Felon in Possession of a Firearm and Habitual Felon case in Guilford County (NC) Superior Court during the week of July 8, 2024.

Based on the above circumstances, the undersigned respectfully requests that this Court accept the late filing of the Record on Appeal and Final Brief.

Respectfully submitted,  
Duncan and Heydary Law, PLLC.

s/W. Michael Duncan  
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July 15, 2024