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Jul 31 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.

**RESPONDENT'S GEORGETOWN COUNTY'S FIRST MOTION
FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Pursuant to the South Carolina Appellate Court Rules ("SCACR"), Respondent County of Georgetown ("Respondent") 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 Respondent's Initial Brief and related materials is August 10, 2024. With a 30-day extension of time, the new deadline would be September 9, 2024.

Respondent seeks an extension the following reasons:

The additional time is needed to examine the transcript of record which approximately 700 pages in length. Appellant's brief contains seven separate legal issues which must be addressed in Respondent's brief. Respondent Georgetown County's attorneys of record have an already pressing workload and schedule in connection with other pending lawsuits.

THEREFORE, Respondent Georgetown County moves this Court for an Order extending the deadline to file his Initial Brief and Designation of Matter by 30 days to September 9, 2024.

Respectfully submitted,

s/ Michael W. Battle

Michael W. Battle (Fed ID #01243)

BATTLE LAW FIRM, LLC

PO BOX 530

Conway, SC 29528

(843) 248-4321

Attorney for Respondent Georgetown County

July 31, 2024
Conway, SC

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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 Respondent County of Georgetown, do hereby certify that I have this date served the foregoing **RESPONDENT'S FIRST 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 July 31, 2024.

Andrew F. Lindemann,
Esq. Lindemann Law
Firm, P.A.
P.O. Box 6923
Columbia, SC 29260
[andrew@ldlawsc.co](mailto:andrew@ldlawsc.com)
m

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

s/Justin Lucey

Justin O'Toole Lucey (S.C. Bar No. 15438)

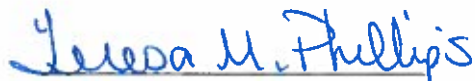
Joshua F. Evans (S.C. Bar No. 77448)

Sohayla R. Townes (S.C. Bar No. 102814)

415 Mill Street

Mount Pleasant, SC 29464

Attorneys for Appellant



Teresa M. Phillips, Paralegal

BATTLE LAW FIRM LLC

PO Box 530

Conway, SC 9527

tphillips@battlelawsc.com

BATTLE LAW FIRM, LLC
ATTORNEYS AND COUNSELORS AT LAW
1121 3RD AVE.
POST OFFICE BOX 530
CONWAY, SOUTH CAROLINA 29528
TELEPHONE (843) 248-4321
FACSIMILE (843) 248-4512
www.battlelawfirm.com

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MICHAEL W. BATTLE
E-Mail Address: mbattle@battlelawsc.com

M. KIRK BATTLE
E-Mail Address: kbattle@battlelawsc.com

July 31, 2024

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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:

Enclosed please find a Motion for Extension of Time to file Respondent Georgetown County's Initial Brief and Designation of Matter, Proof of Service and check in the amount of \$50.00 in the above referenced matter.

By copy of this letter, I am serving Respondent Georgetown County's Motion for Extension on the other counsel of record.

Should you have any questions or need anything further at this time, please do not hesitate to contact me.

Sincerely,


Michael W. Battle

Enclosures: stated

C: Joshua Evans
Justin Lucey
Lisa Thomas
Andrew Lindemann