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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
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2023-001454
CIVIL ACTION NO. 2020-CP-00356

Ron Christmas,

APPELLANT,

versus

County of Georgetown; City of Georgetown; and
South Carolina Department of Transportation,

RESPONDENTS.

MOTION FOR EXTENSION OF TIME

The Initial Brief of Respondent, South Carolina Department of Transportation (“SCDOT”), and Designation of Matter to be Included in the Record on Appeal were originally due on August 12, 2024. At SCDOT’s request, the Court granted a 30-day extension of time, until September 11, 2024, to serve and file the Respondent’s Initial Brief and Designation of Matter. The Respondent, SCDOT, respectfully requests the Court to grant a second extension of 30 days, or until Friday, October 11, 2024, to serve and file its Initial Brief of Respondent and Designation of Matter.

Counsel for SCDOT requests a second extension due to her current workload, including preparation for an upcoming oral argument before this Court, briefing before the Supreme Court, and preparation for a summary judgment hearing in the Circuit Court.

Counsel for SCDOT has contacted the Appellant's counsel and he consents to this request as indicated in the attached document.

Accordingly, the Respondent, SCDOT, respectfully requests an additional 30-day extension of time in which to serve and file its Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

/s Carmen V. Ganjehsani

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**ATTORNEYS FOR RESPONDENT
SOUTH CAROLINA DEPARTMENT
OF TRANSPORTATION**

September 5, 2024.

CERTIFICATE OF SERVICE

I, the undersigned, attorney for Respondent, South Carolina Department of Transportation, do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated September 5, 2024, by personally serving the same pursuant to Section (d)(1) of the Supreme Court’s Amended Order dated April 24, 2024, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

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Joshua Fletcher Evans
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**ATTORNEYS FOR RESPONDENT
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TRANSPORTATION**

Dated: September 5, 2024.

EXHIBIT “A”

From: [Justin Lucey](#)
To: [Carmen Ganjehsani](#); [Lee Weiland](#); [Joshua Evans](#)
Cc: [Lisa Thomas](#)
Subject: RE: Appellate Case No. 2023-001454 Christmas v. Georgetown et al.
Date: Wednesday, September 4, 2024 3:02:19 PM


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Certainly.

From: Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>
Sent: Wednesday, September 4, 2024 2:52 PM
To: Justin Lucey <jlucey@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>
Cc: Lisa Thomas <LThomas@RichardsonPlowden.com>
Subject: FW: Appellate Case No. 2023-001454 Christmas v. Georgetown et al.

Would you consent to a second extension of time of 30 days for me to file the Initial Respondent's Brief and Designations on behalf of SCDOT? This would be our second request for an extension.

Thank you,
Carmen Ganjehsani

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	<p>Carmen V. Ganjehsani Shareholder CGanjehsani@RichardsonPlowden.com</p> <p>Richardson Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 https://link.edgepilot.com/s/5f83f316/lin0JIQkJEaJlusE_a6dRq? u=http://www.richardsonplowden.com/</p>	

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be able to proceed to the destination. If suspicious content is detected, you will see a warning.

From: [Carmen Ganjehsani](#)
To: [Justin Lucey](#); [Lee Weiland](#); jevans@lucey-law.com; andrew@ldlawsc.com; kbattle@battlelawsc.com; mbattle@battlelawsc.com
Cc: [Lisa Thomas](#); [Patrick Huff](#)
Subject: Appellate Case No. 2023-001454 Christmas v. Georgetown et al.
Date: Thursday, September 5, 2024 1:40:07 PM
Attachments: [2023-001454 Christmas v. County of Georgetown et al \(SCDOT Mtn for Ex\) \(3493216\).pdf](#)

Please find served upon you Respondent South Carolina Department of Transportation's Motion for an Extension of Time in the above-referenced appeal.

Carmen Ganjehsani

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September 5, 2024

Filed via e-mail (ctappfilings@sccourts.org) and hand delivery

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

RECEIVED
Sep 05 2024
SC Court of Appeals

Re: Ron Christmas v. County of Georgetown et al.
Appellate Case No. 2023-001454
RPR File No.: 000181-00976

Dear Ms. Kitchings:

Enclosed for filing is the Motion for an Extension of Time to file the Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal on behalf of Respondent South Carolina Department of Transportation in the above-referenced case, along with our Certificate of Service. We are also filing this Motion electronically with the Court of Appeals via e-mail at ctappfilings@sccourts.org pursuant to Section (b)(2) of the Supreme Court's April 24, 2024 Order.

Also enclosed is our firm's check in the amount of \$50.00 for the filing fee in this matter.

We have served this Motion for Extension on counsel of record upon their primary email addresses listed in the Attorney Information System.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely,

/s Carmen V. Ganjehsani

Carmen V. Ganjehsani

Encs.

The Honorable Jenny Abbott Kitchings

September 5, 2024

Page 2

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