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Sep 06 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
B. Alex Hyman, Circuit Court Judge

Appellate Case No. 2023-001454
Case No. 2020-CP-22-0356

Ron Christmas,..... Appellant,

v.

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

**MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF OF
RESPONDENT CITY OF GEORGETOWN**

The Respondent City of Georgetown respectfully moves this Court for an additional extension of time until October 14, 2024, by which to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

The Respondent City of Georgetown's motion is based on the following grounds:

1. The Respondent City of Georgetown's Initial Brief and Designation of Matter to be Included in the Record on Appeal are currently due to be filed and served on or before September 12, 2024.

2. The undersigned counsel requires additional time to complete the City of Georgetown's Initial Brief due to a two-day mediation September 9-10, 2024, as well as Supreme Court oral argument on September 10, 2024.

3. The undersigned has consulted with Joshua F. Evans, counsel for the Appellant, and he consented to the requested extension by email (attached).

WHEREFORE, the Respondent City of Georgetown respectfully requests that it be allowed until October 14, 2024, by which to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN LAW FIRM, P.A.

BY: s/ Andrew F. Lindemann
ANDREW F. LINDEMANN #13030
5 Calendar Court, Suite 202
Post Office Box 6923
Columbia, South Carolina 29260
(803) 881-8920

Counsel for Respondent City of Georgetown

September 6, 2024

From: [Joshua Evans](#)
To: [Andrew Lindemann](#)
Cc: [Mike Battle](#); [Kirk Battle](#); [Carmen Ganjehsani](#); [Lisa Thomas](#); [Lee Weiland](#); [Jennifer Baker](#); [Justin Lucey](#)
Subject: Re: Christmas v. City of Georgetown
Date: Thursday, September 5, 2024 4:46:30 PM

No problem.

Joshua F. Evans

On Sep 5, 2024, at 4:44 PM, Andrew Lindemann <Andrew@ldlawsc.com> wrote:

Josh:

The initial brief for the City of Georgetown is due next week. Given the mediation in Lake Cooper and a Supreme Court argument I have on Tuesday, I am needing to ask the Court of Appeals for a second 30-day extension. I want to file that motion on Friday morning if possible.

Please let me know if you will consent to that extension request.

Thanks for the courtesy.

Andrew

Andrew F. Lindemann
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Columbia, South Carolina 29260
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Email: andrew@ldlawsc.com

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APPEAL FROM GEORGETOWN COUNTY
B. Alex Hyman, Circuit Court Judge

Appellate Case No. 2023-001454
Case No. 2020-CP-22-0356

Ron Christmas,..... Appellant,

v.

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

CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court’s Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), the undersigned employee of Lindemann Law Firm, P.A., counsel for the Respondent City of Georgetown, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Respondent City of Georgetown** was made upon all counsel of record by email only this the 6th day of September 2024, as follows:

Justin O. Lucey, Esquire
Joshua F. Evans, Esquire
Justin O’Toole Lucey, P.A.
Email: jlucey@lucey-law.com
Email: jevans@lucey-law.com

M. Kirk Battle, Esquire
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s/ Andrew F. Lindemann



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*Also Admitted in North Carolina

September 6, 2024

RECEIVED
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SC Court of Appeals

Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

RE: Ron Christmas v. County of Georgetown; City of Georgetown; and South Carolina
Department of Transportation
Appellate Case Number: 2023-001454
Civil Action Number: 2020-CP-22-0356
Claim Number: SF-20-0365-0001
Our File Number: 321.20310

Dear Ms. Kitchings:

Pursuant to Section (b)(2) the Supreme Court's Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (as amended April 26, 2024), please find enclosed for filing the **Motion for Extension of Time to File Initial Brief of Respondent City of Georgetown** with regard to the above referenced appeal. My firm's \$50.00 check for the filing fee will be placed in today's U.S. Mail.

By copy of this letter, I am serving copies on all counsel of record by email only pursuant to Section (d)(1) of the same Supreme Court Order. Thank you for your assistance.

Sincerely,

LINDEMANN LAW FIRM, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosure

cc: Justin O. Lucey, Esquire (*Via Email Only, with Enclosure*)
Joshua F. Evans, Esquire (*Via Email Only, with Enclosure*)
M. Kirk Battle, Esquire (*Via Email Only, with Enclosure*)
Michael W. Battle, Esquire (*Via Email Only, with Enclosure*)
Carmen Vaughn Ganjehsani, Esquire (*Via Email Only, with Enclosure*)
Lisa A. Thomas, Esquire (*Via Email Only, with Enclosure*)