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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Nov 27 2024

SC Court of Appeals

Appeal from Union County
Court of Common Pleas

Honorable Daniel D. Hall

Appellate Case No. 2023-001049

Jane and John Smith, individually and as
Guardians of H.A., and H.A. Individually,

Appellants,

v.

South Carolina Department of Social Services,
South Carolina Department of Children's Advocacy,
Tammy Gaye Causey Dalsing and
Edward Anthony Dalsing,

Respondents.

RESPONDENTS TAMMY GAYE CAUSEY DALRING
AND EDWARD ANTHONY DALRING'S
MOTION TO EXTEND TIME FOR FILING
BRIEF UNDER RULE 234(b), SCACR

Respondents Tammy Gaye Causey Dalsing and Edward Anthony Dalsing (Dalsings),
pursuant to Rule 234(b), SCACR, move the Court to extend the time for filing the initial brief of

the Respondents and Designations of Matter by thirty (30) days. In support of the motion, the Respondents show the following to the court:

1. Respondents' counsel needs additional time to research and draft an adequate brief on appeal and properly frame the issues.
2. Counsel for the Respondents is counsel in another case which was scheduled for a jury trial commencing the same day as the normal due date of the initial brief of the Respondents in this case until yesterday, and the undersigned counsel hereby was diligently working on that case including preparations for a recent unsuccessful Mediation, analysis of significant new expert and damage materials provided by the opposing attorney, and additional preparation.
3. In addition, separate complex cases were successfully mediated yesterday that had been taking up a substantial amount of time, preventing the appropriate time from being directed toward the initial brief in this case. As a result, the undersigned counsel requests additional time to prepare the initial brief and designation of matter in this case.

WHEREFORE, the counsel for Respondents Tammy Gaye Causey Dalsing and Edward Anthony Dalsing respectfully submits that good cause exists for the court to extend the time for filing the initial brief of Respondents and Designation of Matter by thirty (30) days to January 2, 2025, and the Respondents move that the Court extend the time accordingly.

Respectively Submitted,

CLARKSON, WALSH, & COULTER, P.A.

s/P. Christopher Smith, Jr.

James P. Walsh, Esquire (15180)

P. Christopher Smith, Jr. (74086)

P.O. Box 6728

Greenville, South Carolina 29606

(864) (864) 232-4400

jwalsh@clarksonwalsh.com

csmith@clarksonwalsh.com

Attorneys for Defendants Tammy Gaye

Causey Dalsing and Edward Anthony Dalsing

And

THOMPSON DOVE LAW GROUP

L. Dale Dove, Esquire (1735)

P.O. Box 907

Rock Hill, SC 29731

(803) 327-1910

dale@tdlawgroup.com

Attorneys for Defendants Tammy Gaye

Causey Dalsing and Edward Anthony Dalsing

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