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Nov 20 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Jocelyn Newman, Circuit Court Judge

Case No.: 2024-001088

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

vs.

South Carolina Department of  
Social Services,  
RESPONDENTS.

MOTION REQUESTING EXTENSION OF TIME

Appellants, through the undersigned counsel, hereby move the Court for a thirty (30) day extension of time to file the Initial Brief and Designation of Matter. The Initial Brief is currently due on November 22, 2024. Due to counsel's trial schedule through the month of November, additional time is needed to prepare the Brief. This is the first request for an extension of time. The undersigned counsel has consulted with opposing counsel and opposing counsel does not object to the requested extension.

Based on the above circumstances, the undersigned respectfully seeks a thirty-day extension to file the Initial Brief and Designation of Matter. If the requested extension is granted, the Appellants' Initial Brief and Designation of Matter would be due on Monday, December 23, 2024. If the Court wishes to grant an additional extension beyond the Christmas holidays, the undersigned would graciously accept such an extension.

Respectfully submitted,  
Duncan and Heydary Law, PLLC.

s/W. Michael Duncan  
W. Michael Duncan (SC Bar # 0001162)  
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Attorney for Appellants

November 20, 2024

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PROOF OF SERVICE

I certify that I have served the Motion Requesting an Extension of Time on the Respondent listed above by electronic filing to its respective counsel at the email address listed below which appears in the AIS system for the South Carolina Bar Association. The electronic filing was made on November 20, 2024.

Duncan and Heydary Law, PLLC.

November 20, 2024

s/W. Michael Duncan  
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Attorney for Appellants

Other Counsel of Record:  
Attorney for Respondent SC Department of Social Services

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