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**Jan 13 2025**

**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.

SECOND MOTION REQUESTING EXTENSION OF TIME

Appellants, through the undersigned counsel, hereby move the Court for a second thirty (30) day extension of time to file the Initial Brief and Designation of Matter. The Initial Brief is currently due on January 13, 2025. The Court granted Appellants' prior requested extension by Order dated January 9, 2025. Due to trial obligations throughout the month of January, including Court-appointed criminal cases, the undersigned counsel seeks an extension until February 13, 2025, to file the Initial Brief and Designation of Matter.

The undersigned has communicated this afternoon with opposing counsel via e-mail regarding the requested extension but did not receive an immediate reply. Because the Brief is due today, the undersigned is filing this Motion prior to receiving opposing counsel's reply.

Respectfully submitted,  
Duncan and Heydary Law, PLLC.

s/W. Michael Duncan  
W. Michael Duncan (SC Bar # 0001162)  
2411 Pineview Drive  
Greensboro, North Carolina 27407  
(803) 315-4500  
[Mike.duncan@duncanandheydaryl.com](mailto:Mike.duncan@duncanandheydaryl.com)  
Attorney for Appellants

January 13, 2025

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PROOF OF SERVICE

I certify that I have served the Second 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 January 13, 2025.

Duncan and Heydary Law, PLLC.

January 13, 2025

s/W. Michael Duncan  
W. Michael Duncan (SC Bar # 0001162)  
2411 Pineview Drive  
Greensboro, North Carolina 27407  
(803) 315-4500  
[Mike.duncan@duncanandheydaryl.com](mailto:Mike.duncan@duncanandheydaryl.com)  
Attorney for Appellants

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

Vordman C. Traywick, III  
Robinson Gray Stepp and Laffitte. LLC  
Post Office Box 11449  
Columbia, South Carolina 29211  
(803) 231-7810  
[ltraywick@robinsongray.com](mailto:ltraywick@robinsongray.com)