

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge
Civil Action No. 20-CP-46-01803
Appellate Case No. 2025-000032

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SC Court of Appeals

103927

Bobby Blakney Respondent,

v.

City of Rock Hill Appellant.

**MOTION FOR EXTENSION OF TIME TO RESPOND TO
RESPONDENT’S MOTION TO DISMISS APPEAL**

Appellant, City of Rock Hill, pursuant to Rule 263(b)(, SCACR, respectfully move this Court for a second extension of time to file Appellant’s Response to Respondent’s Motion to Dismissal Appeal.

This request for an extension of time is based on the following grounds:

The response is currently due February 6, 2025. During the week of January 27, 2025, we were engaged in trial preparation for two cases involving a high-speed police pursuit involving a death. Those cases were on the roster in Anderson County for this week (February 3, 2025) and were both in the top three on the roster. We also had several depositions in another serious case involving a death scheduled for February 4 and 5, 2025. We had preparation meetings scheduled for Friday January 31, 2025, and Monday February 3, 2025. We cancelled the prep meetings because of the trials.

On Friday January 31, 2025, at about 5:40 p.m., we learned that the trials were continued. We immediately rescheduled the deposition prep meetings for Saturday, January 1, 2025, and Monday January 3, 2025. Sunday, January 2, 2025, was used to review and analyze approximately 500 pages of discovery material in preparation for the Monday meetings. We also had a response to a new lawsuit due on Thursday, January 6, 2025, in addition to discovery due on another serious case involving a death on Wednesday, February 5, 2025, along with depositions in two other cases on February 6, 2025. Given our schedule we have not had time to prepare a response to this motion. This is a motion to dismiss the appeal based on an alleged error made by us and we need sufficient time to review and respond appropriately. We believe that under these circumstances an eleven (11) day extension is warranted. (Day 10 would fall on a Sunday).

For those reasons, we request a second extension of time for a period of eleven (11) days. If granted the new deadline for Appellant's Response to Respondent's Motion to Dismiss the Appeal would be Monday, February 17, 2025. This firm's \$50 filing fee will be sent via the U.S. Postal Service.

WHEREFORE, Appellant respectfully requests an Order extending the time to file its Response to Respondent's Motion to Dismissal Appeal until February 17, 2025.

MORRISON LAW FIRM, LLC

By: s/ David L. Morrison
David L. Morrison (Bar #4101)
7453 Irmo Drive, Suite B
Columbia, South Carolina 29212
Phone: (803) 661-6285
Fax: (803) 661-6289
E-mail: david@dmorrison-law.com

Attorney for Defendant/Appellant

Columbia, South Carolina

February 4, 2025

MORRISON LAW FIRM, LLC
7453 Irmo Drive, Suite B
Columbia, SC 29212

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