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Feb 06 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
J. Mark Hayes, II, Circuit Court Judge

Appellate Case No. 2024-001598
Case No. 2013-CP-42-1569

Kenneth and Angela Hensley, on behalf of their minor child BLH, and All
Others Similarly Situated,..... Respondents,

v.

South Carolina Department of Social Services,..... Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE
INITIAL REPLY BRIEF OF APPELLANT**

The Appellant South Carolina Department of Social Services respectfully move this Court for an additional ten-day extension of time until February 18, 2025 (the Tuesday after President’s Day), by which to file and serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellant’s motion is based on the following grounds:

1. The Appellant’s Initial Reply Brief is currently due to be filed and served on February 6, 2025.

2. The undersigned counsel requires additional time to complete the Appellant's Initial Reply Brief due to other commitments and deadlines. In addition, the undersigned counsel is behind in his preparation of the reply brief due to a recent and ongoing illness.

3. The undersigned has consulted with counsel for the Respondents who has consented to the requested extension by email (copy attached).

WHEREFORE, the Appellant respectfully requests that it be allowed until February 18, 2025, by which to file and serve its Initial Reply 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
Email: andrew@ldlawsc.com

*Counsel for Appellant South Carolina Department
of Social Services*

February 6, 2025

From: [Ryan Langley](#)
To: [Andrew Lindemann](#); thompson@mtsolvlawfirm.com
Cc: [Jennifer \(Baker\) Chapman](#)
Subject: RE: Hensley Appeal TIME SENSITIVE
Date: Thursday, February 6, 2025 12:01:56 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

Hey Andrew. No objection to a ten day extension. Best,
Ryan



T. RYAN LANGLEY

Partner
ryan@thelangleylawfirm.com
229 Magnolia St.
Spartanburg, SC 29306
(864) 774-4662
thelangleylawfirm.com



From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Thursday, February 6, 2025 8:55 AM
To: thompson@mtsolvlawfirm.com; Ryan Langley <ryan@thelangleylawfirm.com>
Cc: Jennifer (Baker) Chapman <Jennifer@ldlawsc.com>
Subject: Hensley Appeal TIME SENSITIVE

Jim and Ryan:

I have a favor to ask. My Initial Reply Brief is due today. Because of my schedule and a continuing nagging illness, I am struggling to get this brief finished today and deal with other deadlines. I would like to ask for an additional 10-day extension. Would you consent to that?

I'd greatly appreciate it.

Thanks.

Andrew

Andrew F. Lindemann
Lindemann Law Firm, P.A.

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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 Appellant, does hereby certify that service of the **Motion for Extension of Time to File Initial Reply Brief of Appellant** in the above-captioned matter was made upon all counsel of record by email only this the 6th day of February 2025, as follows:

T. Ryan Langley, Esquire
Matthew T. Foss, Esquire
Langley Law Firm
Email: ryan@thelangleylawfirm.com
Email: matt@thelangleylawfirm.com

James F. Thompson, Esquire
Thompson Dove Law Group, LLC
Email: jim@tdlawgroup.com

s/ Andrew F. Lindemann



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*Also Admitted in North Carolina

February 6, 2025

RECEIVED
Feb 06 2025
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: Kenneth and Angela Hensley, on behalf of their minor child BLH, and All Others Similarly Situated v. South Carolina Department of Social Services
Appellate Case Number: 2024-001598
Civil Action Number: 2013-CP-42-1569
Our File Number: 103.8851

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 24, 2024), please find enclosed for filing the **Motion for Extension of Time to File Initial Reply Brief of Appellant** with regard to the above referenced appeal. 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.

The Appellant is a state agency and is, therefore, exempt from the filing fee. If you have any questions, please advise. Thank you for your assistance.

Sincerely,

LINDEMANN LAW FIRM, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosures

cc: T. Ryan Langley, Esquire (w/ Enclosures, Via Email Only)
Matthew T. Foss, Esquire (w/ Enclosures, Via Email Only)
James F. Thompson, Esquire (w/ Enclosures, Via Email Only)