

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Patrick C. Fant, III, Circuit Court Judge

Appellate Case No. 2024-001138  
Case No. 2023-CP-23-6416

The Altamont Road Safety Alliance, Sussane Beattie, Brenda Cale, Elaine Carter, Ron And Ava Chitty, Aaron & Heather Collins, Margaret & Robert Degiorgio, Elliot & Jennifer Earle, Laura Edge, Travis Elmore, Marilyn Endler, John Fields, Jim Hambright, Leah Hunter, Lauren Johnson, Cynthia Kinghorn, Alex Kiriakides, Jason Kraning, Elaine & Bill Landreth, Robert & Patricia Lanning, Frank & Barbara League, Louis & Ann Leblanc, Frank Lewkowicz, Forrest & Jane Long, George & Fain McDaniel, Brian Mcsharry, Ronald And Kathy Mercer, Steven & Anna Mickle, Helen & Fred Moorhead, John Parker, Audrey Pasin, Jim Sheets, Matthew Phillips, Shannon Pierce, Michael Rawls, Ronald & Tommie Reece, Daniel And Kimberly Rudzinski, Jason Seefafer, David Taylor, Ronald Trammel, Greg Valente, and Emily & Caleb Vanwingerden, ..... Appellants,

v.

Greenville County Board of Zoning Appeals, ..... Respondent.

**MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF OF RESPONDENT**

The Respondent Greenville County Board of Zoning Appeals respectfully moves this Court for an additional 30-day extension of time until April 25, 2025, by which to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

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

1. The Respondent's Initial Brief and its Designation of Matter to be Included in the Record on Appeal are currently due to be filed and served on or before March 26, 2025.

2. The undersigned counsel requires additional time to complete the Initial Brief of Respondent due to his schedule and deadlines, including having been dealing with COVID and its effects. Specifically, the undersigned counsel has a Supreme Court Petition for Writ of Certiorari as well as a federal court summary judgment motion due March 21, 2025; a Court of Appeals brief and a Supreme Court brief due on March 24, 2025; as well as a federal court summary judgment motion due on March 26, 2025.

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

WHEREFORE, the Respondent Greenville County Board of Zoning Appeals respectfully requests that it be allowed until April 25, 2025, by which to file and serve its Initial 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

*Counsel for Respondent Greenville County Board of  
Zoning Appeals*

March 21, 2025

**From:** [Robert Childs](#)  
**To:** [Andrew Lindemann](#)  
**Cc:** [Patsy Ahearn](#); [Jennifer \(Baker\) Chapman](#)  
**Subject:** RE: Altamont Road Safety Alliance v. Greenville County Board of Zoning Appeals  
**Date:** Thursday, March 20, 2025 2:16:00 PM

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We consent and surely will need the same reciprocal accommodations in the future.

Yours Truly,

Robert "Robbie" C. Childs, III

[Robert@LawyerChilds.com](mailto:Robert@LawyerChilds.com)

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Phone: 864-242-9997

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**THE LAWYERS OATH IN SOUTH CAROLINA AND OUR PLEDGE TO YOU:**

I am duly qualified, according to the Constitution of this State, to exercise the duties of the office to which I have been appointed, and that I will, to the best of my ability, discharge those duties and will preserve, protect, and defend the Constitution of this State and of the United States;

I will maintain the respect and courtesy due to courts of justice, judicial officers, and those who assist them;

To my clients, I pledge faithfulness, competence, diligence, good judgment, and prompt communication;

To opposing parties and their counsel, I pledge fairness, integrity, and civility, not only in court, but also in all written and oral communications;

I will not pursue or maintain any suit or proceeding which appears to me to be unjust nor maintain any defenses except those I believe to be honestly debatable under the law of the land, but this obligation shall not prevent me from defending a person charged with a crime;

I will employ for the purpose of maintaining the causes confided to me only such means as are consistent with trust and honor and the principles of professionalism, and will never seek to mislead an opposing party, the judge, or jury by a false statement of fact or law;

I will respect and preserve inviolate the confidences of my clients, and will accept no compensation in connection with a client's business except from the client or with the client's knowledge and approval;

I will maintain the dignity of the legal system and advance no fact prejudicial to the honor or reputation of a party or witness, unless required by the justice of the cause with which I am charged;

I will assist the defenseless or oppressed by ensuring that justice is available to all citizens and will not delay any person's cause for profit or malice;

So help me God.

This message is a privileged, confidential and protected communication intended solely for the recipient. This message may contain offers of compromise inadmissible under Rule 408 SCRE. Unauthorized use or dissemination is strictly prohibited. Please notify the Childs Law Firm if you received this email in error.

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**From:** Andrew Lindemann <Andrew@ldlawsc.com>

**Sent:** Thursday, March 20, 2025 1:14 PM

**To:** Robert Childs <Robert@lawyerchilds.com>

**Cc:** Patsy Ahearn <Patsy@lawyerchilds.com>; Jennifer (Baker) Chapman <Jennifer@ldlawsc.com>

**Subject:** Altamont Road Safety Alliance v. Greenville County Board of Zoning Appeals

Robby:

I hope you are doing well. I have a favor to ask. I am just getting over a bout of Covid, which has put me behind. I have several other briefs due next week already, and as a result, I plan to ask the Court for an additional 30 day extension to file the Initial Respondent's Brief.

Please let me know if you will consent to that requested extension. I'd like to get my motion filed today if possible.

Thanks.

Andrew

Andrew F. Lindemann  
Lindemann Law Firm, P.A.  
5 Calendar Court, Suite 202  
Post Office Box 6923  
Columbia, South Carolina 29260  
Direct Dial: 803-881-8921  
Email: [andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)

RECEIVED

Mar 21 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Patrick C. Fant, III, Circuit Court Judge

Appellate Case No. 2024-001138  
Case No. 2023-CP-23-6416

The Altamont Road Safety Alliance, Sussane Beattie, Brenda Cale, Elaine Carter, Ron And Ava Chitty, Aaron & Heather Collins, Margaret & Robert Degiorgio, Elliot & Jennifer Earle, Laura Edge, Travis Elmore, Marilyn Endler, John Fields, Jim Hambright, Leah Hunter, Lauren Johnson, Cynthia Kinghorn, Alex Kiriakides, Jason Kraning, Elaine & Bill Landreth, Robert & Patricia Lanning, Frank & Barbara League, Louis & Ann Leblanc, Frank Lewkowicz, Forrest & Jane Long, George & Fain McDaniel, Brian Mcsharry, Ronald And Kathy Mercer, Steven & Anna Mickle, Helen & Fred Moorhead, John Parker, Audrey Pasin, Jim Sheets, Matthew Phillips, Shannon Pierce, Michael Rawls, Ronald & Tommie Reece, Daniel And Kimberly Rudzinski, Jason Seefafer, David Taylor, Ronald Trammel, Greg Valente, and Emily & Caleb Vanwingerden, ..... Appellants,

v.

Greenville County Board of Zoning Appeals, ..... Respondent.

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 Respondent, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Respondent** was made upon all counsel of record by email only this the 21st day of March 2025, as follows:

Robert C. Childs, III, Esquire  
Childs Law Firm LLC  
Email: [robert@lawyerchilds.com](mailto:robert@lawyerchilds.com)

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*s/ Andrew F. Lindemann*



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ANDREW F. LINDEMANN\*  
Direct Dial: (803) 881-8921  
Email: [andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)

\*Also Admitted in North Carolina

March 21, 2025

RECEIVED  
Mar 21 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](mailto:ctappfilings@sccourts.org)

RE: The Altamont Road Safety Alliance v. Greenville County Board of Zoning Appeals  
Appellate Case Number: 2024-001138  
Civil Action Number: 2023-CP-23-6416  
Our File Number: 79.20722

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 Brief of Respondent** 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.

My firm's \$50.00 check for the filing fee will be sent to the Court via U.S. Mail. If you have any questions, please advise. Thank you for your assistance.

Sincerely,

LINDEMANN LAW FIRM, P.A.

A handwritten signature in blue ink, appearing to read 'A. Lindemann', is written over a horizontal line.

Andrew F. Lindemann

AFL/jac  
Enclosure

cc: Robert C. Childs, III, Esquire (w/ Enclosure, Via Email Only)