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**May 08 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

Case No.: 2024-001088

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

vs.

South Carolina Department of  
Social Services,  
RESPONDENT.

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MOTION TO ALLOW LATE FILING

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Appellants, through the undersigned counsel, hereby move the Court to allow the late filing of its Initial Brief and Designation of Matter to be Included in the Record on Appeal. This Court issued a letter on April 29, 2025, setting a May 9, 2025, deadline for filing and counsel for Appellants is submitting the Initial Brief and Designation of Matter in accordance with that letter.

Medical issues with counsel's 90-year-old stepfather has taken counsel away from work for a period of time and has delayed the preparation and filing of the Initial Brief.

Based on the above circumstances, the undersigned respectfully requests that the Court accept the filing of the Initial Brief and Designation of Matter.

Respectfully submitted,  
Duncan and Heydary Law, PLLC.

s/W. Michael Duncan  
W. Michael Duncan (SC Bar # 0001162)  
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May 7, 2025