

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM AIKEN COUNTY
Eugene C. Griffith, Jr., Circuit Court Judge

Appellate Case No. 2024-000592
Case No. 2020-CP-02-2238

Cassiopia Rhoads,..... Respondent-Appellant,

v.

Aiken County Sheriff’s Office,..... Appellant-Respondent.

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

The Appellant-Respondent Aiken County Sheriff’s Office respectfully moves this Court for an additional 10-day extension of time until July 24, 2025, by which to file and serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellant-Respondent Aiken County Sheriff’s Office’s motion is based on the following grounds:

1. The Initial Reply Brief and its Designation of Matter to be Included in the Record on Appeal of Appellant-Respondent Aiken County Sheriff’s Office are currently due to be filed and served on or before July 14, 2025.

2. The undersigned counsel needs additional time due to other obligations and deadlines including an Administrative Law Court Brief, a Petition for Writ of Certiorari, and

three Returns to Petitions for Mandamus due in the Supreme Court on July 14, 2025. Additionally, the undersigned counsel is a sole-practitioner and his wife had a recent accident resulting in a broken right ankle and fractured left foot. She had surgery last week and is essentially immobile and house-bound with the undersigned being her sole caregiver.

3. Counsel for the Aiken County Sheriff's Office consents to Rhoads' requested extension on her Initial Reply Brief, and counsel for Rhoads has provided consent for the Sheriff's Office's extension by reply email. (Email attached).

WHEREFORE, the Appellant-Respondent Aiken County Sheriff's Office respectfully requests that it be allowed until July 24, 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-Respondent
Aiken County Sheriff's Office*

July 11, 2025

From: [Andrew Lindemann](#)
To: ["Patrick McLaughlin"](#); ["Brink Hinson"](#)
Cc: [Jennifer \(Baker\) Chapman](#)
Subject: RE: Rhoads - State Court Appeal
Date: Friday, July 11, 2025 9:10:36 AM

Thanks. I appreciate it.

From: Patrick McLaughlin <patrick@wukelalaw.com>
Sent: Friday, July 11, 2025 9:09 AM
To: Andrew Lindemann <Andrew@ldlawsc.com>; 'Brink Hinson' <brink@hhplawgroup.com>
Cc: Jennifer (Baker) Chapman <Jennifer@ldlawsc.com>
Subject: Re: Rhoads - State Court Appeal

Andrew:

Brink is traveling today, so not sure if he's on a plane yet or not. But we are fine with the extension. You may put in your motion that we consent. Hope your wife is going ok and is recuperating.

If you need something else, I'm also out of office today, but you can hit my mobile 843-409-3892.

Patrick J. McLaughlin
Wukela Law Firm
403 Second Loop Rd.
PO Box 13057
Florence, SC 29504-3057
(O) 843-669-5634
(M) 843-409-3892
Patrick@wukelalaw.com

From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Friday, July 11, 2025 9:02:46 AM
To: 'Brink Hinson' <brink@hhplawgroup.com>
Cc: Patrick McLaughlin <patrick@wukelalaw.com>; Jennifer (Baker) Chapman <Jennifer@ldlawsc.com>
Subject: RE: Rhoads - State Court Appeal

Brink:

Thanks for the email and the good wishes. I originally thought I would stick with the current deadline but after being out most of yesterday due to a doctor's appointment with my wife, I think I will take

you up on your offer and make a request today for an additional 10 days. I assume you are still fine with that? I will get a motion filed shortly.

I appreciate it.

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

From: Brink Hinson <brink@hhplawgroup.com>
Sent: Wednesday, July 9, 2025 4:06 PM
To: Andrew Lindemann <Andrew@ldlawsc.com>
Cc: 'Patrick Mclaughlin' <patrick@wukelalaw.com>
Subject: Rhoads - State Court Appeal

Andrew –

I'm sorry to hear about your wife. I hope she is covering well.

Considering her injuries, will you be seeking an extension on the reply brief in the state court appeal in Rhoads? I have no objection to you seeking such, but if you are going to ask for an extension, I would likely seek the same to make sure we stay on the same schedule for our briefing. Kindly let me know your plans, and I'll follow suit and do the same.

Thanks,

Brink

Francis M. "Brink" Hinson, IV
Attorney at Law

HHP LAW GROUP, LLC
Hinson, Hiller, & Padgett
2020 Assembly Street
Columbia, SC 29201
803-400-8277 (Main)

RECEIVED

Jul 11 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM AIKEN COUNTY
Eugene C. Griffith, Jr., Circuit Court Judge

Appellate Case No. 2024-000592
Case No. 2020-CP-02-2238

Cassiopia Rhoads,.....

Respondent-Appellant,

v.

Aiken County Sheriff's Office,.....

Appellant-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 Appellant-Respondent Aiken County Sheriff's Office, does hereby certify that service of the **Motion for Extension of Time to File Initial Reply Brief of Appellant-Respondent** in the above-captioned matter was made upon all counsel of record by email only this the 11th day of July 2025, as follows:

Francis M. Hinson, IV, Esquire
HHP Law Group, LLC
Email: brink@hhplawgroup.com

Patrick J. McLaughlin, Esquire
Wukela Law Firm
Email: Patrick@wukelalaw.com

s/ Andrew F. Lindemann



Telephone (803) 881-8920
Facsimile (803) 862-1181

5 Calendar Court, Suite 202 (29206)
Post Office Box 6923
Columbia, South Carolina 29260

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

*Also Admitted in North Carolina

July 11, 2025

RECEIVED
Jul 11 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: Cassiopia Rhoads v. Aiken County Sheriff's Office
Appellate Case Number: 2024-000592
Civil Action Number: 2020-CP-02-2238
Claim Number: 2020G00077
Our File Number: 333.20304

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-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 by mailed 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.

Andrew F. Lindemann

AFL/jac
Enclosures

cc: Francis M. Hinson, IV, Esquire (w/ Enclosures, Via Email Only)
Patrick J. McLaughlin, Esquire (w/ Enclosures, Via Email Only)