

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

69969

R. Markley Dennis Jr., Circuit Court Judge

Case No.: 2012-CP-08-1283

Jennifer Bowzard, Appellant

v.

Berkeley County Sheriff's Office
and Sheriff Wayne DeWitt, Respondents

**MOTION FOR EXTENSION OF TIME
TO SERVE/FILE INITIAL BRIEF OF RESPONDENTS
BERKELEY COUNTY SHERIFF'S OFFICE
AND SHERIFF WAYNE DEWITT**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA
COURT OF APPEALS

COME NOW Respondents, Berkeley County Sheriff's Office and Sheriff Wayne DeWitt, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move this Honorable Court as follows for an extension of thirty (30) days' time to serve/file their initial respondents' brief

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and corresponding designation of matter to be included in the record on appeal.

The Appellant, Jennifer Bowzard, served her initial brief on September 9, 2013. Based on this date of service, pursuant to Rule 208(a)(2), SCACR, the Respondent's initial brief is presently due to be served/filed on or before October 9, 2013. In light of work-related and other time commitments, the Respondents ask for an additional extension of 30 days beyond October 9, 2013, through November 8, 2013, to serve/file their initial respondents' brief and corresponding designation of matter to be included in the record on appeal. The Court's allowance of the requested extension will be of considerable benefit to the Respondents' counsel in preparing the Respondents' initial brief/designation of matter and, counsel respectfully submits, it is in the interests of justice and will work no undue prejudice upon the Appellant. Additionally, counsel for respondents has contacted counsel for appellant, and he has graciously consented to this extension.

WHEREFORE, the Respondents Berkeley County Sheriff's Office and Sheriff Wayne DeWitt, move for an extension of time through November 8, 2013 to serve/file his initial respondent's brief and corresponding designation of matter to be included in the record on appeal. Further, the Respondents ask that their present briefing deadline be held in abeyance pending the Court's action on this motion.

Respectfully submitted,



ROBIN L. JACKSON

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Sept 30, 2013

Attorney for Respondents Berkeley County
Sheriff's Office and Sheriff Wayne DeWitt

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R. Markley Dennis Jr., Circuit Court Judge

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CERTIFICATE OF SERVICE

This is to certify that I, Caitlin E. Pierson, with the law firm of Senn Legal, LLC, Attorneys for the Respondents, have this date mailed via U.S. Mail with first class postage prepaid, a true and correct copy of the within Respondents' Motion for Extension of Time to Serve/File Initial Brief of Respondents Berkeley County Sheriff's Office and Sheriff Wayne DeWitt to:

John E. Parker, Esquire
William F. Barnes, III, Esquire
Peters, Murdaugh, Parker, Eltzroth & Detrick
P.O. Box 457
Hampton, SC 29924-0457

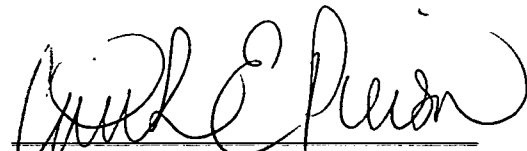
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SC Court of Appeals

Lawrence C. Kobrovsky, Esquire
Lawrence C. Kobrovsky, P.A.
123 Meeting St.
Charleston, SC 29401

Attorneys for Appellant Jennifer Bowzard



Carlin E. Pierson

September 30, 2013
Charleston, SC


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Robin@sennlegal.com

September 30, 2013

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

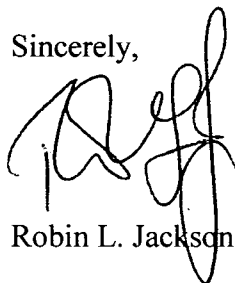
RE: Jennifer Bowzard v. Berkeley County, et al
Case No.: 2012-CP-08-1283

Dear Clerk:

Please find enclosed Respondents Berkeley County Sheriff's Office and Sheriff Wayne DeWitt's motion for extension of time to file their initial respondents' brief in this matter. Also enclosed is my firm's check for the \$25 motion fee and a certificate of service showing service on all counsel of record.

With kind regards, I am,

Sincerely,



Robin L. Jackson

RLJ/cep
Enclosure

cc: William F. Barnes, III, Esquire
John E. Parker, Esquire
Lawrence C. Kobrovsky, Esquire

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