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September 15, 2025

RECEIVED
Sep 15 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: Paul Vernon Coffman, Jr. v. Town of Port Royal and Kimberly Carter
Appellate Case Number: 2025-000818
Civil Action Number: 2021-CP-07-1217
Claim Number: D6755
Our File Number: 106.20756

Dear Ms. Kitchings:

Pursuant to Section (b)(2) of the Supreme Court's Order RE: 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 Appellants** with regard to the above referenced matter. 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.

Thank you very much for your consideration of this request. My firm's \$50.00 check for the filing fee will be mailed to the Court via U.S. Mail.

If you have any questions, please advise.

Sincerely,

LINDEMANN LAW FIRM, P.A.

Andrew F. Lindemann

AFL/jac
Enclosures

The Honorable Jenny Abbott Kitchings
September 15, 2025
Page Two

cc: John S. Nichols, Esquire (*w/ Enclosure, Via Email Only*)
Thad L. Myers, Esquire (*w/ Enclosure, Via Email Only*)
Jeremiah J. Shellenberg, Esquire (*w/ Enclosure, Via Email Only*)
Joshua P. Golson, Esquire (*w/ Enclosure, Via Email Only*)
Grady L. Patterson, Esquire (*w/ Enclosure, Via Email Only*)
Thomas A. Bendle, Esquire (*w/ Enclosure, Via Email Only*)
Robert S. Dennis, Esquire (*w/ Enclosure, Via Email Only*)

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
H. Steven DeBerry, IV, Circuit Court Judge

Appellate Case No. 2025-000818
Case No. 2021-CP-07-1217

RECEIVED
Sep 15 2025
SC Court of Appeals

Paul Vernon Coffman, Jr., Respondent,

v.

Town of Port Royal and Kimberly Carter,..... Appellants.

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

The Appellants Town of Port Royal and Kimberly Carter respectfully move this Court for an additional 20-day extension of time until October 7, 2025, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellants' motion is based on the following grounds:

1. The Appellants' Initial Brief and their Designation of Matter to be Included in the Record on Appeal are currently due to be filed and served on or before September 17, 2025.
2. The undersigned counsel requires additional time to complete the Initial Brief of Appellants due to other obligations and deadlines, including having had two briefs due in the South Carolina Supreme Court on September 12, 2025, and another brief due in the Supreme Court on

September 15, 2025. Additionally, the undersigned counsel has two briefs due in the next two weeks at the Fourth Circuit Court of Appeals.

3. The undersigned has consulted with counsel for the Respondent, and he consented to the requested extension by reply email. (See attached).

WHEREFORE, the Appellants Town of Port Royal and Kimberly Carter respectfully request that they be allowed until October 7, 2025, by which to file and serve their 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
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Counsel for Appellants

September 15, 2025

From: [John Nichols](#)
To: [Andrew Lindemann](#)
Cc: [Thad Myers](#); [JJ Shellenberg](#); josh@joshgolsonlaw.com; glp@pattersonlawoffices.net; tbendle@hgpha.com; rdennis@hgpha.com; [Jennifer Chapman](#)
Subject: RE: Coffman v. Town of Port Royal TIME SENSITIVE
Date: Monday, September 15, 2025 10:01:37 AM

Andrew

By all means. Let them know we consulted and consent.

And it is good to be back!

Take care,

John S. Nichols

[Bluestein Thompson Sullivan, LLC](#)



JOHN SHANNON NICHOLS
OF COUNSEL

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RECEIVED
Sep 15 2025
SC Court of Appeals

From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Monday, September 15, 2025 9:17 AM
To: John Nichols <john@bluesteinattorneys.com>
Cc: Thad Myers <Thad@ThadMyersPA.com>; JJ Shellenberg <JJ@ThadMyersPA.com>; josh@joshgolsonlaw.com; glp@pattersonlawoffices.net; tbendle@hgpha.com; rdennis@hgpha.com; Jennifer Chapman <Jennifer@ldlawsc.com>
Subject: Coffman v. Town of Port Royal TIME SENSITIVE
Importance: High

You don't often get email from andrew@ldlawsc.com. [Learn why this is important](#)

[EXTERNAL EMAIL]

John:

Welcome back to private practice. It will be good having appeals with you again. We have certainly had a number over the years.

I have a huge favor to ask. My initial brief is due on Wednesday. I have just been inundated with appellate briefs lately. I had two due in the Supreme Court this past Friday and another due today. Plus, I got two more in the next two weeks at the Fourth Circuit. I'd like to ask the Court of Appeals for an additional 20 day extension for the Initial Brief in this case. Please let me know if you will consent to that request. I would like to get that motion filed this morning if possible.

Thanks. I look forward to working with you on this one.

Andrew

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APPEAL FROM BEAUFORT COUNTY
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Town of Port Royal and Kimberly Carter, Appellants.

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 Appellants, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Appellants** in the above-captioned matter was made upon all counsel of record by email only this the 15th day of September 2025, as follows:

John S. Nichols, Esquire
Bluestein Thompson Sullivan, LLC
Email: john@bluesteinattorneys.com

Thad L. Myers, Esquire
Jeremiah J. Shellenberg, Esquire
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s/ Andrew F. Lindemann