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Dec 31 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

Case No.: 2024-001088

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

vs.

South Carolina Department of
Social Services,
RESPONDENTS.

MOTION TO ALLOW LATE FILING

Appellants, through the undersigned counsel, hereby move the Court to allow the late filing of the Record on Appeal which is attached hereto. This Court issued a letter dated December 22, 2025, setting a deadline for January 2, 2026, for filing and counsel for Appellants is submitting the Record on Appeal in accordance with that letter.

Health issues involving counsel's ninety-year-old stepfather and ninety-year-old father-in-law have resulted in substantial lost time from work since the Amended Designation of Matter to be Included in the Record on Appeal was filed on November 7, 2025. In addition, since that November 7th filing, counsel was in Guilford County (NC) Superior Court during the first three weeks of December 2025 handling several criminal case on which he was appointed to represent indigent defendants.

Based on the above circumstances, the undersigned respectfully requests that this Court accept the late filing of the Record on Appeal.

Respectfully submitted,
Duncan and Heydary Law, PLLC.

s/W. Michael Duncan
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December 30, 2025