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Jan 20 2026

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

Honorable Circuit Court Judge Dianne S. Goodstein

Case No. 2026-000034

Stephanie Lehman,

Respondent,

v.

Berkeley County School District and
Anne-Magill Payne, individually, and as an
agent of Berkeley County School District, Defendants,

of which Berkeley County School District
is the Appellant,

Appellant.

**MOTION FOR EXTENSION OF TIME FOR APPELLANT TO FILE MEMORANDUM
ON APPEALABILITY**

Appellant Berkeley County School District (“BCSD”), through its undersigned counsel, hereby requests of the Court an extension of time to file Appellant’s Memorandum on Appealability. Appellant's Memorandum on Appeal ability is due Tuesday, January 20, 2026. Obligations of Respondent’s counsel on other cases and other deadlines necessitate an extension of time for the undersigned firm to prepare Appellant's Memorandum on Appealability.

For the reasons discussed, the undersigned respectfully requests an extension of time until Tuesday, January 27, 2026, to file Appellant's Memorandum on Appealability. Prior to

filing this motion, Appellant's counsel consulted with counsel for Respondent, and Respondent does not oppose Appellant's request for the requested extension of time.

Respectfully submitted,

s/ Bob J. Conley

CLAWSON & STAUBES, LLC
126 Seven Farms Drive, Suite 200
Charleston, South Carolina 29492
Telephone: (843) 577-2026
bconley@cslaw.com

Attorney for Appellant

Charleston, South Carolina
Date: January 20, 2026

Others of Record:

Emmanuel J. Ferguson
FERGUSON LAW AND MEDIATION, LLC
171 Church Street, Suite 160
Charleston, South Carolina 29401
Telephone: 843.491.4890
emmanuel@fergusonlaborlaw.com

Attorney for Respondent

John W. Fletcher
BARWELL, WHALEY, PATTERSON & HELMS
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Charleston, SC 29402
Telephone: (843) 577-7700
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Attorney for Defendant
Anne-Magill Payne

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agent of Berkeley County School District, Defendants,

of which Berkeley County School District
is the Appellant,

Appellant.

**PROOF OF SERVICE OF MOTION FOR EXTENSION OF TIME FOR APPELLANT
TO FILE MEMORANDUM ON APPEALABILITY**

Bob J. Conley
CLAWSON & STAUBES, LLC
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Charleston, South Carolina 29492
Telephone: (843) 577-2026
bconley@cslaw.com

Attorney for Appellant

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 May 6, 2022), the undersigned counsel for the Appellant Berkeley County School District, does hereby certify that service of the **Motion for Extension of Time for Appellant to File Memorandum on Appealability** in the above-captioned matter was made upon Respondent by email on this 20th day of January 2026 as follows:

Emmanuel J. Ferguson
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Attorney for Respondent

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Attorney for Defendant
Anne-Magill Payne

s/Bob J. Conley
Bob J. Conley, Esquire

Charleston, South Carolina
Date: January 20, 2026



CLAWSON & STAUBES

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SC Court of Appeals

January 20, 2026

Via Email Only

The Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

Re: *Stephanie Lehman v. Berkeley County School District*
Civil Action No.: 2026-000034

Dear Ms. Kitchings:

Enclosed for filing is a Motion for Extension of Time for Appellant to File Memorandum on Appealability. Also enclosed is the Proof of Service of the Motion for Extension of Time for Appellant to File Memorandum on Appealability on the Respondent.

A check for filing fee of \$25.00 is being sent separately by mail.

Sincerely,

CLAWSON & STAUBES, LLC

s/ Bob J. Conley
Bob J. Conley

BJC/md

Enclosure: as stated

cc: Emmanuel Ferguson, Esquire
John Fletcher, Esquire