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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 INITIAL
BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD
ON APPEAL**

Appellant Berkeley County School District, through its undersigned counsel, hereby requests an extension of time to file Appellant's initial brief and designation of matter for the record on appeal. After Appellant filed this appeal on January 6, 2026, the Court issued letter on January 8, 2026, requiring Appellant and Respondent to file memoranda addressing appealability. Thereafter, Respondent filed her memorandum on January 20, 2026, and Appellant filed its memorandum on January 27, 2026. In the interim, on January 21, 2026, Appellant received the

hearing transcript from the court reporter. The Court issued its Order on March 25, 2026, allowing Appellant's appeal to proceed.

Given the preceding history, Appellant requests the Court set and/or extend its deadline to file its initial brief and designation of matter to be included in the record on appeal for Friday, April 27, 2026, which is thirty days after the Court issued its Order on March 25, 2026. Setting the briefing scheduled to begin in this manner allows for efficient processing of the appeal and does not prejudice either party.

For the reasons discussed, the undersigned respectfully requests the Court set and/or extend its deadline to file its initial brief and designation of matter to be included in the record on appeal for Friday, April 27, 2026, which is thirty days after the Court issued its Order on March 25, 2026, allowing the appeal to proceed. Prior to filing this motion, Appellant's counsel consulted with counsel for Respondent, and Respondent does not oppose Appellant's request.

Respectfully submitted,

s/ Bob J. Conley
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Charleston, South Carolina 29492
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bconley@cslaw.com

Attorney for Appellant

Charleston, South Carolina
Date: April 1, 2026

Others of Record:

Emmanuel J. Ferguson
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Attorney for Respondent

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Attorney for Defendant
Anne-Magill Payne

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**PROOF OF SERVICE OF MOTION FOR EXTENSION OF TIME FOR
APPELLANT TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

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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 Initial Brief and Designation of Matter to be Included in the Record on Appeal** in the above-captioned matter was made upon Respondent by email on this 1st day of April 2026 as follows:

Emmanuel J. Ferguson
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Attorney for Defendant
Anne-Magill Payne

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

Charleston, South Carolina
Date: April 1, 2026



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SC Court of Appeals

April 1, 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*
No.: 2026-000034

Dear Ms. Kitchings:

Enclosed for filing is a Motion for Extension of Time for Appellant to File Initial Brief and Designation of Matter to be Included in Record on Appeal. Also enclosed is the related Proof of Service.

A check for the filing fee of \$50.00 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