

THE STATE OF SOUTH CAROLINA  
COURT OF APPEALS

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

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Common Pleas Case No.: 2024-CP-08-01894  
Appellate Case No. 2025-000194

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Erik Lebkicher, Carissa Lebkicher and E.L., a minor child.....Appellants

v.

Stephanie Davidson and Drew P. Finnegan,.....Respondents.

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**APPELLANTS’ MOTION TO ACCEPT LATE-FILED AMENDED INITIAL BRIEF AND  
FOR LEAVE TO FILE OUT OF TIME**

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Appellants, by and through undersigned counsel, respectfully move this Court for an Order authorizing the late-filed Appellant’s Brief and granting leave to file the same out of time. In support thereof, Appellants show as follows:

1. On February 13, 2026, this Court issued an Order granting Appellants’ motion to amend their initial brief and directing that the Amended Initial Brief be filed within ten (10) days.
2. The same Order also granted Appellants’ motion to allow late filing of the Reply Brief and imposed a separate twenty (20) day deadline for that filing.
3. Undersigned counsel inadvertently calendared and complied with the deadline for the Reply Brief, but mistakenly failed to calendar the separate ten (10) day deadline for filing the Amended Initial Brief.
4. This omission was unintentional and constitutes excusable neglect.
5. Appellants have now completed the Appellant’s Brief and are prepared to file it contemporaneously once an Order on this this Motion has been granted.

6. Respondents will suffer no prejudice from the late filing, as the delay is minimal and the case remains in the briefing stage. Respondent's counsel consent to the original amendment to correct a scrivener's error.
7. In the interest of justice and judicial economy, Appellants respectfully request that the Court accept the Appellant's Brief out of time.

**WHEREFORE**, Appellants respectfully request that this Court:

1. Accept the Amended Initial Brief as timely filed; and
2. Grant such other and further relief as the Court deems just and proper.

**FERRARA LAW FIRM, PLLC**

*/s Paul B. Ferrara, III*

Paul B. Ferrara, III

SC Bar No. 70511

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*Attorney for Appellants*

April 3, 2026

North Charleston, South Carolina

**RECEIVED**

**Apr 03 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

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Common Pleas Case No.: 2024-CP-08-01894  
Appellate Case No.: 2025-001090

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Erik Lebkicher, Carissa Lebkicher, and  
E. L., a minor child,.....Appellants,

v.

Stephanie Davidson & Drew P.  
Finnegan,.....Respondents.

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**CERTIFICATE OF SERVICE**

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I, the undersigned, hereby certify that I have served the foregoing motion to allow Appellants Brief to be filed late upon counsel by emailing a copy of the same on April 3, 2026 addressed to their attorney of record:

Daniel Paul Ranaldo – Attorney for Stephanie Davidson  
Clawson & Staubes, LLC  
126 Seven Farms Dr., Suite #200  
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April 3, 2026

**RECEIVED**

**Apr 03 2026**

**SC Court of Appeals**

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*Paul B. Ferrara, III\**  
*Janel K. Ferrara\**

April 3, 2026

**SENT VIA US MAIL**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
**via ctappfilings@sccourts.org**

Re: Erik Leblicher v. Stephanie Davidson et. al  
Appellate Case No. 2025-00190  
Our File No.: 23-561

Dear Ms. Kitchings:

Please find enclosed Appellant's motion for extension of time to file and serve Appellant's final brief. The brief is the product of the prior relief requested and granted by the Court on February 13, 2026. This brief deadline was inadvertently not calendared, for the reasons more as fully set forth below. By way of reference, the Record on Appeal and Appellant's Brief in Reply have been filed as of today. The only remaining brief to file by the Appellant is the final corrected Appellant's Brief that includes the omitted statement of issues on appeal.

I am enclosing a check for \$50 for the filing fee. Opposing counsel has been copied with this communication.

Do not hesitate to contact our office with any questions or concerns.

**FERRARA LAW FIRM, PLLC**



Paul B. Ferrara, III