

**RECEIVED**

**May 06 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 RETURN TO  
RESPONDENT’S MOTION TO DISMISS APPEAL**

---

Appellant Berkeley County School District, through its undersigned counsel, hereby requests an extension of time to file its return to Respondent’s Motion to Dismiss Appeal. Appellant’s return is currently due on Monday, May 11, 2026. Appellant requests the Court extend its deadline to file its return to Tuesday, May 26, 2026.

The undersigned respectfully requests the Court extend its deadline to file its return until Tuesday, May 26, 2026. 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

Amanda M. Gaston (SC Bar # 104135)

Bob J. Conley (SC Bar # 12243)

CLAWSON & STAUBES, LLC

126 Seven Farms Drive, Suite 200

Charleston, South Carolina 29492

Telephone: (843) 577-2026

[bconley@cslaw.com](mailto:bconley@cslaw.com)

[agaston@cslaw.com](mailto:agaston@cslaw.com)

Attorneys for Appellant

Charleston, South Carolina

Date: May 6, 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](mailto:emmanuel@fergusonlaborlaw.com)

Attorney for Respondent

RECEIVED

May 06 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.

---

**PROOF OF SERVICE OF APPELLANT'S MOTION FOR EXTENSION OF TIME  
TO FILE RETURN TO RESPONDENT'S MOTION TO DISMISS APPEAL**

---

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 **Appellant's Motion for Extension of Time to File Return to Respondent's Motion to Dismiss Appeal** in the above-captioned matter was made upon Respondent by email on this 6th day of May 2026 as follows:

Emmanuel J. Ferguson  
FERGUSON LAW AND MEDIATION, LLC  
171 Church Street, Suite 160  
Charleston, South Carolina 29401  
Telephone: (843) 491-4890  
[emmanuel@fergusonlaborlaw.com](mailto:emmanuel@fergusonlaborlaw.com)

Attorney for Respondent

s/ Bob J. Conley  
Amanda M. Gaston (SC Bar # 104135)  
Bob J. Conley (SC Bar # 12243)  
CLAWSON AND STAUBES, LLC  
126 Seven Farms Drive, Suite 200  
Charleston, South Carolina 29492  
Phone: (843) 577-2026  
Email: [agaston@cslaw.com](mailto:agaston@cslaw.com)  
[bconley@cslaw.com](mailto:bconley@cslaw.com)

Attorneys for Appellant

Charleston, South Carolina  
Date: May 6, 2026



CLAWSON & STAUBES

BOB J. CONLEY  
[BCONLEY@CSLAW.COM](mailto:BCONLEY@CSLAW.COM)  
126 SEVEN FARMS DR., SUITE 200  
CHARLESTON, SC 29492  
(843) 577-2026

May 6, 2026

**Via Email Only**

The Honorable Jenny Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**RECEIVED**

**May 06 2026**

**SC Court of Appeals**

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 Return to Appellant's Motion to Dismiss 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