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May 29 2026

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from York County
Court of Common Pleas

Appellate Case No. 2026-000199

Dennis Floyd Bivens,.....Appellant,

v.

York County by and through Joshua Edwards, York County
Manager, Josh Reinhardt, York County Development
Services Manager, Jonathan Buono, York County and
Development Services Director,.....Respondents.

APPELLANT MOTION FOR CONTINUANCE AND
EXTENSION TO FILE REPLY BRIEF

Appellant Dennis Floyd Bivens, by and through undersigned counsel, respectfully moves before this Court for a continuance and a ten (10)day extension of time within which to file Appellant's Reply Brief. This motion is filed after consultation between Appellant counsel and Respondent Counsel, who does not object to the relief being sought.

WHEREFORE, Appellant prays that the deadline to file and serve Reply to Respondent Initial Brief be Monday June 8, 2026. This is Appellant's first request for an extension of time.

Respectfully submitted,

HALFORD LAW FIRM

/s/ J. Cameron Halford

J. Cameron Halford-Attorney at Law-

LLC Post Office Box 172

Barnwell, South Carolina 29812

Telephone: 803-524-8659

Attorney for Appellant

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Services Manager, Jonathan Buono, York County and
Development Services Director,.....Respondents.

Proof of Service
Appellant Extension to File Reply Brief

This is to certify that I, Sarah Caldwell, paralegal for J. Cameron Halford-Attorney at Law-LLC, have caused to be served on this 28th day of May 2026 a copy of the foregoing Appellant’s Motion for Continuance and Ten-Day Extension of Time to File Reply Brief on counsel for Respondents by electronic filing system and email addressed as follows:

Jonathan M. Robinson
Austin T. Reed
SMITH ROBINSON, LLC
3200 Devine Street
Columbia, South Carolina 29205
jon.robinson@smithrobinsonlaw.com
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Chad N. Johnston
Samantha J. Dorward
BURR & FORMAN LLP
1221 Main Street, Suite 1800
Columbia, South Carolina 29201
cjohnston@burr.com
sdorward@burr.com

Respectfully submitted,



Sarah Caldwell

/s./ Sarah Caldwell

Paralegal

HALFORD LAW FIRM

J. Cameron Halford-Attorney at Law-LLC

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Barnwell, South Carolina 29812

(803) 524-8659

E-mail: cam@halfordlaw.net

ATTORNEY FOR APPELLANT

DENNIS FLOYD BIVENS

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Please file with letter from you.

May 29 2026

From J Cameron Halford <Cam@halfordlaw.net>

Date Thu 5/28/2026 3:21 PM

To Sarah Caldwell <sarah@halfordlaw.net>

SC Court of Appeals

 2 attachments (264 KB)

Proof of Service Appellant Motion for Extension.pdf; Motion for 10 Day Extention.pdf;

Do a letter like their paralegal did. Attach to these two indicating our check will arrive by U.S. mailing for the motion.

Dear Office of the Clerk :

Please find attached for filing the Appellant's motion for extension and proof of service. Our offices will mail the filing fee by USPS. If you will kindly clock the motion and forward back to my attention. Thank you for your assistance

Sarah Caldwell

Filing is Simple.

1. File the two PDF documents and the letter by email to CTAPPFILINGS@SCCOURTS.ORG.
2. Await clocked copy by reply email.
3. Serve the othe lawyers by email only.
4. Drop the check into US mail for \$50

Let me know if questions.

cAm



— J. CAMERON HALFORD —
ATTORNEY AT LAW

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95 ALLEN ST.
BARNWELL, SC 29812
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May 29 2026

SC Court of Appeals

May 28, 2026

VIA ELECTRONIC FILING

The Honorable Jeny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeal
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

RE: Dennis F. Bivens vs. York County;
Appellate Case No. 2026-000199

Dear Ms. Kitchings,

Please find attached for filing the Appellant's motion for extension and proof of service. Our offices will mail the filing fee by USPS. If you will kindly clock the motion and forward back to my attention. Thank you for your kind assistance.

Respectfully,

Sarah Caldwell,
Paralegal to
J. Cameron Halford
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cam@halfordlaw.net