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Jun 18 2026

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS
THE HONORABLE JOCELYN NEWMAN
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2025-001923
CIVIL ACTION NO. 2020-CP-40-05532

Marion Katrell Campbell, on behalf of himself and all others similarly situated,

RESPONDENT,

versus

South Carolina Department of Corrections,

APPELLANT,

AND

Wardell Williams, Harry Simmons, Jr., and Isiah Rollins,

RESPONDENT,

versus

South Carolina Department of Corrections,

APPELLANT,

AND

Larry Hampton, Christopher McDowell, David Payton, Jr., and Michael Smoak,

RESPONDENT,

versus

South Carolina Department of Corrections,

APPELLANT,

AND

Henry Belton,

RESPONDENT,

versus

South Carolina Department of Corrections,

APPELLANT.

MOTION FOR EXTENSION OF TIME

The Initial Reply Brief of Appellant, South Carolina Department of Corrections, and Additional Designation of Matter to be Included in the Record on Appeal are currently due on June 22, 2026. The Appellant respectfully requests the Court to grant an extension of 21 days, or until Monday, July 13, 2026, to serve and file its Initial Reply Brief and Additional Designation of Matter.

Counsel for Appellant requests an extension due to her current workload, including preparation of appellate briefs before this Court, and due to medical appointments and a vacation.

Counsel for Appellant has contacted the Respondents' counsel, and they consent to this request as indicated in the attached Exhibit "A."

Accordingly, the Appellant, South Carolina Department of Corrections, respectfully requests a 21-day extension of time in which to serve and file its Initial Reply Brief and Additional Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

/s Carmen V. Ganjehsani

Carmen V. Ganjehsani

(S.C. Bar No. 73515)

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Corrections

June 18, 2026.

EXHIBIT “A”

From: [Andrew Hand](#)
To: [Carmen Ganjehsani](#)
Cc: [kyle@wdwlawfirm.com](#); [philipalanlaw@aol.com](#); [drew@wdwlawfirm.com](#); [Dick Harpootlian](#); [cperkins@attorneyssc.com](#); [cwhetstone@attorneyssc.com](#); [William H. Davidson II](#); [Susan Keefe](#); [Heather Hardy](#)
Subject: RE: App. Case No. 2025-001923 Campbell v. SCDC
Date: Wednesday, June 17, 2026 1:36:05 PM

Warning: Unusual sender <arh@harpootlianlaw.com>

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I think 20 days would fall on a Sunday. We'll consent to a 21-day extension until July 13.

Andrew

From: Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>
Sent: Wednesday, June 17, 2026 1:30 PM
To: Andrew Hand <arh@harpootlianlaw.com>
Cc: [kyle@wdwlawfirm.com](#); [philipalanlaw@aol.com](#); [drew@wdwlawfirm.com](#); [Dick Harpootlian](#) <rah@harpootlianlaw.com>; [cperkins@attorneyssc.com](#); [cwhetstone@attorneyssc.com](#); [William H. Davidson II](#) <wdavidson@DML-LAW.com>; [Susan Keefe](#) <skeefe@attorneyssc.com>; [Heather Hardy](#) <heather@harpootlianlaw.com>
Subject: RE: App. Case No. 2025-001923 Campbell v. SCDC

I was wondering if you would consent to a 20-day extension for me to file my Initial Reply Brief. It is currently due on June 22, but between my daughters and I, we will have had 3 medical appointments this week and I am also preparing a respondent's brief. I will then be on vacation from June 24-July 2.

Thank you,
Carmen Ganjehsani

From: Andrew Hand <[arh@harpootlianlaw.com](#)>
Sent: Wednesday, May 6, 2026 1:23 PM
To: Carmen Ganjehsani <[CGanjehsani@RichardsonPlowden.com](#)>
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Subject: RE: App. Case No. 2025-001923 Campbell v. SCDC

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CERTIFICATE OF SERVICE

SC Court of Appeals

I, the undersigned, attorney for Appellant, South Carolina Department of Corrections, do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated June 18, 2026, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Amended Order dated April 24, 2024, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

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A copy of the sent email is enclosed with this Certificate of Service.

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Date: June 18, 2026.

From: [Carmen Ganjehsani](#)
To: ["kyle@wdwlawfirm.com"](#); ["philipalanlaw@aol.com"](#); ["drew@wdwlawfirm.com"](#); ["arh@harpootianlaw.com"](#); ["rah@harpootianlaw.com"](#); ["cperkins@attorneyssc.com"](#); ["cwhetstone@attorneyssc.com"](#); ["Susan Keefe"](#)
Cc: ["William H. Davidson II"](#)
Subject: App. Case No. 2025-001923 Campbell v. SCDC
Date: Thursday, June 18, 2026 3:13:00 PM
Attachments: [2025-001923 Campbell v. SCDC \(Mtn for Ex - Reply\) \(4213357\).pdf](#)

Please find served upon you the Motion for an Extension of Time on behalf of the Appellant South Carolina Department of Corrections.

Thank you,
Carmen Ganjehsani

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