



VIA E-FILING AND U.S. MAIL

July 15, 2026

The Honorable Patrica A. Howard, Clerk
South Carolina of Supreme Court
P.O. Box 11330
Columbia, South Carolina. 29211
supctfilings@sccourts.org

RECEIVED

Jul 15 2026

S.C. SUPREME COURT

In Re: Winbush v. City of Anderson, et al., Appellant Case No.: 2026-001506

Dear Ms. Howard:

J. Franklin McClain and I are counsel of record for the City of Anderson, Anderson Municipal Election Commission, David Ford, Clare E. Humphrey, and Renee Fields-York in the above-referenced appeal.

Pursuant to the Court's Order dated July 9, 2026, granting Appellant's motion to expedite, Respondents' initial brief is presently due within five days after service of Appellant's initial brief. Appellant served her twenty-six (26) page initial brief by email on July 14, 2026, making Respondents' brief due on Monday, July 20, 2026.

Respondents respectfully request a limited extension of this deadline, through and including the end of day on Thursday, July 23, 2026, within which to serve and file Respondents' initial brief.

Respondents recognize, and do not dispute, that election matters warrant expedited treatment, and this request is not made for purposes of delay. Rather, the requested extension is necessary because of a convergence of scheduling conflicts and practical constraints affecting the preparation of Respondents' initial brief, including the following:

1. J. Franklin McClain, Esq., City Attorney for the City of Anderson, is currently out of the county and unavailable to assist in the preparation and review of Respondents' brief;
2. David McQuen, City of Anderson Manager, is on vacation this week and unavailable; and
3. Respondents have been unable to secure appellate counsel to date. Rob Tyson, Esq., has tentatively agreed to undertake their representation, contingent upon the Court granting a modest extension. Mr. Tyson is also out of the office this week and, as a result, is unavailable to prepare the Respondents' brief within the current deadline.

Additionally, Respondents must obtain and review the transcript of the May 25, 2026, hearing before the circuit court to adequately address the factual and procedural assertions contained in Appellant's twenty-six (26) page brief. The combination of the compressed briefing schedule, the length and substance of Appellant's brief, the need to review the hearing transcript, and the simultaneous unavailability of the individuals identified above has created a significant burden on Respondents' ability to prepare a complete and accurate response within the time currently allotted.

Respondents believe that the requested extension, through end of Thursday, July 23, 2026, is modest and will not materially affect the expedited resolution of this appeal. Respondents are mindful of the Court's directive that extensions will not be granted absent extraordinary circumstances and respectfully submit that the circumstances described above — the simultaneous unavailability of the City Attorney, City Manager, and outside appellate counsel, together with the need to obtain and review the hearing transcript and respond to appellant's substantial brief — constitute such circumstances.

The undersigned has conferred with Appellant's counsel regarding this request. Mr. Kenney advised that he is unable to consent to the requested extension in light of the Supreme Court's order expediting this appeal.

Respondents appreciate the Court's consideration of this request. Mr. Kenney and Darryl Thompson have been copied on this correspondence. Should the Court have any questions or require additional information, please do not hesitate to contact me.

Respectfully submitted,

s/Rame L. Campbell

Rame L. Campbell (SC Bar No.: 13981)
Assistant City Attorney, City of Anderson
401 S. Main St.
Anderson, SC 29624
864-260-4349 (Ofc)
rcampbell@cityofandersonsc.com

cc: Christopher P. Kenney, Esq.
J. Franklin McClain, Esq.
Darryl Thompson (Pro Se)
Rob Tyson, Esq.