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Jul 27 2026

SC Court of Appeals

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

Appeal from Charleston County
Court of Common Pleas

Eugene P. Warr, Jr., Circuit Court Judge

Appellate Case No. 2026-000211
Circuit Court Case No. 2025-CP-10-03621

Joel Ndunda,

Appellant,

v.

Brandi Pfeil, LP-A, Crisis Intervention Employee, individually and officially;
Caitlyn McGarty, Crisis Intervention Employee, individually and officially; South
Carolina Department of Behavioral and Developmental Disabilities, Office of
Mental Health; and Charleston Dorchester Mental Health Center,

Defendants,

Of which Brandi Pfeil, Caitlin McGarty, and Charleston Dorchester Mental
Health Center are the

Respondents.

**SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE RETURN TO
APPELLANT'S MOTION FOR SUMMARY REVERSAL AND VACATUR OF ORDER
OF DISMISSAL**

CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No. 66468)

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Attorneys for Charleston Dorchester Mental

Health Center, Caitlin McGarty, and Brandi Pfeil

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Respondents, Charleston Dorchester Mental Health Center, Caitlin McGarty, and Brandi Pfeil, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for a second extension of ten (10) days' additional time to file and serve their Return to Appellant's Motion for Summary Reversal and Vacatur of the Order of Dismissal or, Alternatively, to Supplement the Record Pursuant to Rule 212, SCACR.

The Appellant served his Motion for Summary Reversal and Vacatur of the Order of Dismissal on the Ground of Extrinsic Fraud on the Tribunal or, in the alternative, to Supplement the Record Pursuant to Rule 212, SCACR on July 6, 2026. Thereafter, on July 16, 2026, Respondents filed a motion for extension of time to respond to Appellant's motion, requesting extension of this deadline through July 27, 2026. This motion has not yet been acted upon by the Court.

On account of work-related and other time commitments, Respondents respectfully request this deadline be extended by 10 additional days. Respectfully, Respondents believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

WHEREFORE, Respondents respectfully move this Honorable Court to grant a second extension of ten (10) days within which to file and serve their Return to Appellant's Motion for Summary Reversal and Vacatur or, Alternatively, to Supplement the Record. With the requested extension, Respondents' new deadline to file and serve their Return would be August 6, 2026, according to the undersigned's calculations. Respondents further request that the present deadline be held in abeyance pending the Court's ruling on this motion.

[Signed on next page]

[Signature page for Second Motion for Extension of Time to File/Serve Return to Appellant's Motion for Summary Reversal and Vacatur of Order of Dismissal, Appellate No. 2026-000211]

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
Brian L. Quisenberry (SC Bar No. 73637)
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*Attorneys for Charleston Dorchester Mental
Health Center, Caitlin McGarty, and Brandi
Pfeil*

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PROOF OF SERVICE

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Health Center, Caitlin McGarty, and Brandi
Pfeil*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE RETURN TO APPELLANT'S MOTION FOR SUMMARY REVERSAL AND VACATUR OF ORDER OF DISMISSAL** was served on all other parties to this appeal on July 27, 2026, via US Mail to the following address:

Joel Ndunda
4015 Laurelwood Drive
Charleston, SC 29414
pro se Appellant

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Respondents

Charleston, South Carolina

July 27, 2026