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Oct 23 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 The South Carolina Department
of Behavioral Health and Developmental Disabilities are the

Respondents.

**MOTION FOR EXTENSION OF TIME TO OCTOBER 26, 2026,
TO FILE/SERVE INITIAL BRIEF OF RESPONDENTS**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Brian L. Quisenberry (SC Bar No. 73637)
Russell G. Hines (SC Bar No. 72100)
Zachary M. Kern (SC Bar No. 103731)
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(843) 720-5488

Attorneys for Respondents

NOW COME Respondents, by and through their undersigned counsel, pursuant to Rule 263, SCACR, and, on the grounds set forth below, hereby move this Honorable Court to extend the time for them to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal until Monday, October 26, 2026.

Presently, by correspondence dated September 30, 2026, the Court advised that this appeal is no longer held in abeyance and that the deadline for Respondents' initial brief is October 20, 2026. And on October 20, 2026, the undersigned filed a motion asking for an extension of this deadline to Friday, October 23, 2026, which motion the Court has not yet acted on. Essentially, the instant motion seeks to amend the relief requested in the undersigned's pending motion of October 20th to include one (1) additional business day, i.e., to include Monday, October 26th. The prior request for an extension to October 23rd was made in good faith in the interest of requesting the least amount of additional time believed necessary, but the undersigned nonetheless remains in need of one (1) additional business day beyond October 23rd to complete Respondents' initial brief. As before, the instant request is made because of work-related and other time commitments, and the undersigned respectfully submits that there is good cause to grant the relief now sought as a reasonable and modest dispensation that is warranted under the circumstances, consistent with the interests of justice, and will not work any undue prejudice upon Appellant.

WHEREFORE, Respondents respectfully move this Honorable Court to extend the deadline for them to file/serve their initial brief and corresponding designation of matter until Monday, October 26, 2026. Respondents further request that the present deadline be held in abeyance pending the Court's ruling on this motion.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Stephen L. Brown (SC Bar No. 66468)
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Office of Mental Health; and Charleston Dorchester Mental Health Center,

Defendants,

Of which Brandi Pfeil, Caitlin McGarty, and The South Carolina Department
of Behavioral Health and Developmental Disabilities are the

Respondents.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Respondents

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the **MOTION FOR EXTENSION OF TIME TO OCTOBER 26, 2026, TO FILE/SERVE INITIAL BRIEF OF RESPONDENTS** was, on October 23, 2026, emailed, and the next business day placed in the U.S. Mail, to Appellant at the respective email and mailing addresses below:

Joel Ndunda
4015 Laurelwood Drive
Charleston, SC 29414
geospatial02@outlook.com

Appellant

Respectfully submitted,
CLEMENT RIVERS, LLP

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

Charleston, South Carolina

October 23, 2026

Hines, Russell

From: Hines, Russell
Sent: Friday, October 23, 2026 9:07 PM
To: 'geospatial02@outlook.com'
Cc: Kern, Zachary (Zach); Justman, Barbara; Justman, Aimee; Quisenberry, Brian; Brown, Stephen L.
Subject: Ndunda v. Pfeil (2026-000211) -- Motion for Extension to 10-26-26 for Initial Brief of Respondents
Attachments: Ndunda v. Pfeil (2026-000211) -- Motion for Extension to 10-26-26 for Initial Brief of Respondents.pdf

Attached please find the **Motion for Extension of Time to October 26, 2026, to File/Serve Initial Brief of Respondents.**

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