

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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APPEAL FROM LEE COUNTY  
COURT OF COMMON PLEAS

Thomas W. Cooper, Jr., Circuit Court Judge

S.C. Supreme Court

Appellate Case No. 2007-065159

Abbeville County School District, et al., ..... Appellants-Respondents,

v.

The State of South Carolina, et al., of whom Hugh K. Leatherman, Sr., as President Pro Tempore of the Senate and as a representative of the South Carolina Senate, and James H. Lucas., as Speaker Pro Tempore of the House of Representatives and as a representative of the South Carolina House of Representatives, are ..... Respondents-Appellants

and

State of South Carolina, Nikki R. Haley, as Governor of the State of South Carolina are, ..... Respondents.

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**OPPOSITION OF APPELLANTS-RESPONDENTS TO  
RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE  
PETITION FOR REHEARING**

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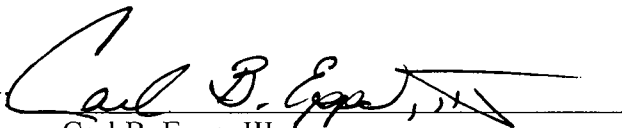
Appellants-Respondents respectfully submit this Opposition to Respondents' Motion for an extension of time to file a Petition for Rehearing. Although undersigned counsel is sensitive to the opposing counsel's scheduling concerns, this matter has been pending before the courts of this state for more than two decades. An entire generation of children has passed through the public education system since this lawsuit was filed,

and our State cannot afford to delay implementation of this Court's Order. Over the course of twenty-one years of litigation, the issues have been thoroughly vetted and exhaustively briefed. While the Plaintiff School Districts were hopeful that the State would accept the Court's directive and join with them to move forward with a sense of urgency, this does not appear to be the case. The Plaintiff Districts cannot accept further delay in developing a public education system that offers a minimally adequate educational opportunity to all children in the State, including the at-risk children in the Plaintiff Districts whose very lives depend on it. When balanced against the needs of these thousands of school children, the convenience of a lawyer cannot stand in the way of the parties' ability to meet the Court's mandate with all reasonable speed, despite undersigned counsel's personal preference of accommodating opposing counsels' requests.

For these reasons, Appellants-Respondents respectfully oppose the Respondents' request for an extension of time to Petition this Court for Rehearing.

Respectfully submitted,

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*Attorneys for Appellants-Respondents*

Nov. 17, 2014

Columbia, South Carolina

CERTIFICATE OF SERVICE

I, the undersigned of the law offices of Nelson Mullins Riley & Scarborough L.L.P., attorneys for Appellants-Respondents, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by **hand delivery** to the following address(es):

Pleadings: Opposition of Appellants-Respondents to Respondents' Motion for Extension of Time to File Petition for Rehearing

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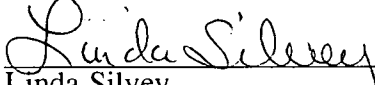
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Administrative Assistant

Nov. 17, 2014