

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

J. Cordell Maddox, Jr., Circuit Court Judge

C.A. No.: 2014-001282

Appellate Case No. 2014-001282

RECEIVED

JAN 02 2015

SC Court of Appeals

746666

Mariam R. Noorai Appellant,

v.

The School District of Pickens County, The School District of Oconee
County, and Gary Culler, Donald Boggs, Richard Hudak, Earnestine
Williams, Marilyn Raines, and Dr. Kelly Pew in their individual
capacities..... Respondents.

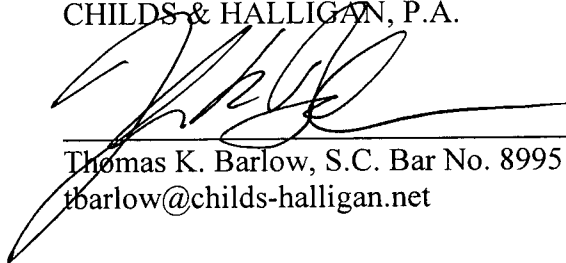
MOTION FOR EXTENSION OF TIME

Pursuant to Rule 263(b), SCACR, Respondents, School District of Oconee
County and Earnestine Williams, respectfully move the Court for a thirty (30) day
extension of time in which to file their Initial Brief and Designation of Matter, up to and
including Friday, February 6, 2015. Respondents' Counsel requires additional time due
to other case demands, the Christmas and New Years holidays and scheduling issues, and
this motion is submitted in good faith and is not intended for purposes of delay.

Respondents have conferred with all counsel of record, and counsel consent to
this thirty (30) day extension.

Respectfully submitted,

CHILDS & HALLIGAN, P.A.



Thomas K. Barlow, S.C. Bar No. 8995
tbarlow@childs-halligan.net

1301 Gervais Street, Suite 900
P.O. Box 11367
Columbia, SC 29211
(803) 254-4035

Attorneys for Respondents School District of
Oconee County and Earnestine Williams

January 2, 2015

Columbia, South Carolina

Other Counsel of Record:

R. Mills Arial, Jr., Esq.
Law Office of R. Mills Arial, Jr.
11 North Irvine Street, Suite 11
Greenville, SC 29601

David T. Duff, Esq.
Laura Callaway Hart, Esq.
Duff, White and Turner, LLC
P.O. Box 1486
Columbia, SC 29202

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

JAN 02 2015

SC Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

J. Cordell Maddox, Jr., Circuit Court Judge

C.A. No.: 2014-001282

Appellate Case No. 2014-001282


Mariam R. Noorai Appellant,

v.

The School District of Pickens County, The School District of Oconee
County, and Gary Culler, Donald Boggs, Richard Hudak, Earnestine
Williams, Marilyn Raines, and Dr. Kelly Pew in their individual
capacities..... Respondents.

PROOF OF SERVICE

I certify that I have served Respondents' MOTION FOR EXTENSION OF TIME
on all counsel of record by depositing a copy of it in the U.S. Mail, postage prepaid, on
January 2, 2015, addressed to counsel as listed below.



Lonna M. Coufal
Legal Assistant to Thomas K. Barlow, Esq.

Counsel served:

R. Mills Arial, Jr., Esq.
Law Office of R. Mills Arial, Jr.
11 North Irvine Street, Suite 11
Greenville, SC 29601

David T. Duff, Esq.
Laura Callaway Hart, Esq.
Duff, White and Turner, LLC
P.O. Box 1486
Columbia, SC 29202

CHILDS & HALLIGAN

A PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

Kenneth L. Childs
William F. Halligan
Kathryn Long Mahoney
Allen D. Smith†
Shirley M. Fawley*
John M. Reagle**
Vernie L. Williams
Thomas K. Barlow**

The Tower at 1301 Gervais Street, Suite 900, Columbia, SC 29201
Post Office Box 11367, Columbia, SC 29211-1367

Telephone (803) 254-4035
Facsimile (803) 771-4422

Allison Aiken Hanna
Keith R. Powell***
Connie P. Jackson
Kimberly Kelley Blackburn
Jasmine Rogers Drain**
Dwayne T. Mazyck
Tyler R. Turner
Mary Allison Caudell

January 2, 2015

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

RECEIVED

JAN 02 2015

SC Court of Appeals

†Certified Specialist in Employment
and Labor Law
*Also admitted in District of Columbia
**Also admitted in North Carolina
***Also admitted in Missouri
**Also admitted in Georgia

Re: Mariam R. Noorai v. Sch. Dist. of Pickens Co., Sch. Dist. of Oconee Co.,
and Gary Culler, Donald Boggs, Richard Hudak, Earnestine Williams,
Marilyn Raines and Dr. Kelly Pew, in their individual capacities
Case No. 2014-001955

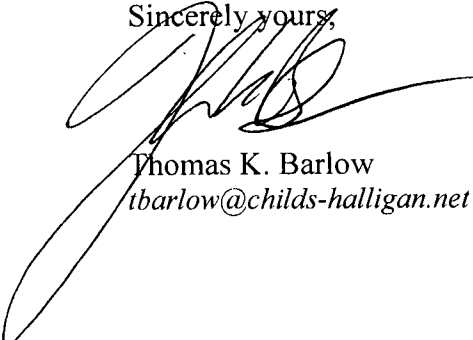
Dear Ms. Kitchings:

Our firm represents Respondents School District of Oconee County and Earnestine Williams in connection with the above-referenced appeal. Enclosed for filing please find an original and 7 copies of our Motion for Extension of Time. Also enclosed is a \$25.00 check for the motion fee.

Please return the extra file-stamped copies of this filing to our office via our courier. By copy of this letter we are today serving copies of the above-referenced filing on all counsel of record.

Thank you for your assistance with this matter.

Sincerely yours,


Thomas K. Barlow
tbarlow@childs-halligan.net

/lmc
Enclosures

c: R. Mills Ariail, Jr., Esq.
Laura Callaway Hart, Esq.
David T. Duff, Esq.

Hand Delivery

CHILDS & HALLIGAN

A PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

Post Office Box 11367
Columbia, SC 29211-1367

TO:

**The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201**