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December 23, 2014

Of Counsel
Kenneth P. Woodington

Writer's Email: kwoodington@dml-law.com

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

DEC 29 2014

SC Court of Appeals

RE: Edward Mims, by and through his legal guardian, Margaret Mims v. Babcock Center, Inc.,
Judy Johnson, the South Carolina Department of Disabilities and Special Needs, Kathi Lacy
and Stanley Butkus
Appellate Case Number: 2014-001373
Civil Action Number: 2007-CP-40-3365
Claim Number: 44654
Our File Number: 104.7785

Dear Ms. Kitchings:

This letter is to request, if necessary, an extension of time until January 20, 2015, in which to file the Initial Brief of Respondents South Carolina Department of Disabilities and Special Needs, Lacy and Butkus, and their Designation of Matter to be Included in the Record on Appeal in the above referenced appeal. The Initial Brief of Appellants was served on December 4, 2014, but Appellant's Designation of Matter was not served until December 18, 2014. Counsel for Appellant has consented to this request, and in fact has included this request on behalf of Respondents in her Motion to File Designation Out of Time, filed on December 18.

On December 4, 2014, Appellant filed a motion to exceed page limit on December 4, 2014. As far as I am aware, this has not yet been decided by the Court, so I assume that further briefing in this case is presently being held in abeyance, but am making this request in an abundance of caution.

If these Respondents' Initial Brief and Designation were due 30 days after the service of the Appellant's Initial Brief without a Designation, a matter about which I am not entirely certain, the due date would be January 5, 2015. The requested extension amounts to a request for 15 additional days from December 4, 2014.

The Honorable Jenny Abbott Kitchings
December 23, 2014
Page Two


This request is made because of the intervention of the holidays, the length of the Brief of Appellants, and other obligations and deadlines.

I have not included the \$25.00 filing fee since these Respondents are exempt. If you require a formal motion, please advise.

With highest regards, I am

Sincerely yours,

DAVIDSON & LINDEMANN, P.A.



Kenneth P. Woodington

KPW/jmb

cc: Patricia L. Harrison, Esquire
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