

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
G. Thomas Cooper, Jr., Circuit Court Judge

Case No. 2007-CP-40-03365
Case No. 2014-001373

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SC Court of Appeals

1748⁰⁴

Edward Mims, by and through his legal
Guardian, Margaret Mims, Appellant.

VS

Babcock Center, Inc., Judy Johnson, the South Carolina
Department of Disabilities and Special Needs, Kathi Lacy
And Stan Butkus, Respondents.

**RESPONDENTS
BABCOCK CENTER, INC.
AND JUDY JOHNSON'S
MOTION FOR SECOND EXTENSION OF
TIME TO FILE RESPONDENTS' INITIAL BRIEF
AND DESIGNATION OF MATTER**

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

Pursuant to Rule 240, SCACR, Respondents Babcock Center, Inc. and
Judy Johnson move for a second extension of time to file Respondents' Initial
Brief and Designation of Matter. Respondents' Initial Brief and Designation

of Matter is due today, January 20, 2015, but counsel respectfully requests an additional thirty (30) days extension until Thursday, February 19, 2015.

This is counsel's second request for extension, as the first request for extension was submitted within Appellant's Motion by Consent to File Designation of Matter Out of Time and to Extend Respondents' due date for Initial Brief.

Counsel has been diligent in his pursuit of filing the Respondents' Initial Brief and Designation; however, because of the number and complexity of the issues extant in the instant case and the cascade of competing deadlines and obligations connected with counsel's other trial and appellate matters, counsel respectfully requests additional time to complete this work.

Consequently, the undersigned counsel respectfully moves this Court for an Order granting him an extension to file and serve his Initial Respondents' Brief and Designation of Matter.

The undersigned counsel greatly appreciates the Court's time, attention, and assistance with regard to this request.

[SIGNATURE BLOCK ON FOLLOWING PAGE]

Respectfully submitted,
COLLINS & LACY, P.C.



By: _____
CHRISTIAN STEGMAIER
cstegmaier@collinsandlacy.com
1330 Lady Street, Sixth Floor (29201)
Post Office Box 12487
Columbia, South Carolina 29211
(803) 256-2660 (voice)
(803) 771-4484 (facsimile)

January 20, 2015
Columbia, South Carolina

**ATTORNEYS FOR RESPONDENTS
BABCOCK CENTER, INC.
AND JUDY JOHNSON**

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Case No. 2007-CP-40-03365
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Edward Mims, by and through his legal
Guardian, Margaret Mims, Appellant.

VS

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Department of Disabilities and Special Needs, Kathi Lacy
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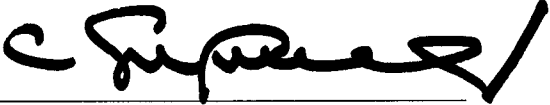
PROOF OF SERVICE

Counsel for Respondents Babcock Center, Inc. and Judy Johnson certifies that he has served Respondents Babcock Center, Inc. and Judy Johnson's Motion for Second Extension of Time on all parties by depositing a copy of it in the United States Mail, postage prepaid, on January 20, 2015, addressed to the following attorneys of record:

Patricia Logan Harrison, Esquire
611 Holly Street
Columbia, SC 29205
Counsel for Appellant

Kenneth P. Woodington, Esquire
Davidson & Lindemann, P.A.
P. O. Box 8568
Columbia, SC 29202-8568
*Counsel for Respondents the South Carolina
Department of Disabilities and Special Needs, Kathi Lacy
And Stan Butkus*

Respectfully submitted,
COLLINS & LACY, P.C.

By: 

~~CHRISTIAN STEGMAIER~~
cstegmaier@collinsandlacy.com
1330 Lady Street, Suite 601
Post Office Box 12487
Columbia, South Carolina 29211
(803) 256-2660 (voice)
(803) 771-4484 (facsimile)

**PROOF OF SERVICE –
ATTORNEYS FOR RESPONDENTS
BABCOCK CENTER, INC. AND
JUDY JOHNSON**



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

January 20, 2015

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
Edgar Brown Building
1205 Pendleton Street
Columbia, SC 29211

Re: *Edward Mims, by and through his legal Guardian, Margaret Mims, Appellant,
v. Babcock Center, Inc, Judy Johnson, et al, Respondents*
Civil Action No. 2007-CP-40-3365
Appellate Case No. 2014-001373
C&L File No. 000969-00109

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of the Motion for a Second Extension to File and Serve Respondents' Initial Reply Brief and Designation of Matter in the above-referenced matter. I am also enclosing a check in the amount of \$25.00 for the required filing fee. Please return a clocked copy of the motion to us by our courier.

By copy of this letter, a copy of same is being served upon counsel of record.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact me.

Respectfully,

Christian Stegmaier

CS/mmm
Enclosures

cc: Kenneth P. Woodington, Esquire.
Patricia L. Harrison, Esquire

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JAN 20 2015

SC Court of Appeals