

75587

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APR 03 2015

SC Court of Appeals

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

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

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 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 an extension of time to file Respondents' Initial Brief
and Designation of Matter. Respondents' Initial Brief and Designation of

Matter is due Friday, April 3, 2015, but counsel respectfully requests an additional twenty (20) days extension until Thursday, April 23, 2015.

This is counsel's first request for extension after the filing of Appellant's Amended Initial Brief. Counsel has been diligent in the pursuit of filing the Respondents' Initial Brief and Designation; however, due to a case (Kobe, Mark & John v. Babcock Center, et al) heading to trial in federal court and then settlement within the last two weeks and the tsunami of other litigation-related matters in recent weeks, including flying in and out of Boston for depositions. Also lead counsel for this matter, Mr. Stegmaier, is out of town on a long planned vacation with his family. Pursuant to these reasons, counsel respectfully requests additional time to complete this work.

Consequently, the undersigned counsel respectfully moves this Court for an Order granting them an extension to file and serve the Initial Respondents' Brief and Designation of Matter. This will be the last request for extension.

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: Meghan J. Hall
CHRISTIAN STEGMAIER
cstegmaier@collinsandlacy.com
MEGHAN HAZELWOOD HALL
mhall@collinsandlacy.com
1330 Lady Street, Sixth Floor (29201)
Post Office Box 12487
Columbia, South Carolina 29211
(803) 256-2660 (voice)
(803) 771-4484 (facsimile)

April 3, 2015
Columbia, South Carolina

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

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

RECEIVED

APR 03 2015

SC Court of Appeals

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.

PROOF OF SERVICE

Counsel for Respondents Babcock Center, Inc. and Judy Johnson certifies that (s)he has served Respondents Babcock Center, Inc. and Judy Johnson's Motion for Extension of Time on all parties by depositing a copy of it in the United States Mail, postage prepaid, on April 3, 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: Meghan J. Hall
CHRISTIAN STEGMAIER
cstegmaier@collinsandlacy.com
MEGHAN HAZELWOOD HALL
mhall@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**



Monica M. McGee | D 803 255 0458 | E mmcgee@collinsandlacy.com
Senior Paralegal

RECEIVED

APR 03 2015

SC Court of Appeals

April 3, 2015

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1220 Senate 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 an 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,

A handwritten signature in black ink, appearing to read 'Monica McGee'.

Monica M. McGee
Senior Paralegal

CS/mmm
Enclosures

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