

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2012-CP-10-5429

Sara Y. Wilson,

Appellant,

v.

Charleston County School District,

Respondent,

**THIRD MOTION FOR EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF OF RESPONDENT**

YOUNG CLEMENT RIVERS LLP
Stephen L. Brown
Catherine H. Chase
Leslie M. Whitten
25 Calhoun Street, Suite 400, 29401
P. O. Box 993, Charleston, SC 29402
Telephone: (843) 577-4000
Facsimile: (843) 579-2983
E-Mail: sbrown@ycrlaw.com
cchase@ycrlaw.com
lwhitten@ycrlaw.com
*Attorneys for the Respondent
Charleston County School District*

RECEIVED

JUN 04 2015

SC Court of Appeals

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

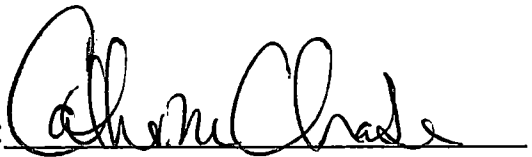
COMES NOW the Respondent, Charleston County School District, by and through undersigned counsel, pursuant to Rule 263(b), SCACR, and moves this Honorable Court for an additional extension of thirty (30) days' time to file/serve the Initial Brief of Respondent and corresponding designation of matter to be included in the record on appeal.

The Appellant served her initial brief on March 4, 2015; thereby, making the Respondent's initial briefing deadline April 3, 2015, according to Rule 208(a)(2), SCACR. Previously, by Orders of this Court filed April 7, 2015 and May 8, 2015, Respondent's briefing deadline has been extended through June 3, 2015.

In light of other time commitments, the undersigned respectfully requests that Respondent's deadline for serving/filing its initial brief and corresponding designation of matter to be included in the record on appeal be extended by 30 days from June 3, 2015, i.e., through July 3, 2015. The undersigned has consulted with Appellant's counsel, Blake Hewitt, who has no objection. Accordingly, Respondent believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

WHEREFORE, Respondent respectfully requests that this Honorable Court grant an additional extension of 30 days' time to serve/file the Initial Brief of Respondent and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for service/filing of Respondent's initial brief and designation of matter would be July 3, 2015, according to the undersigned's calculations. Further, Respondent respectfully requests that the Court hold Respondent's present deadline for briefing/designation of matter in abeyance until it acts upon this motion.

YOUNG CLEMENT RIVERS LLP

By: 

Stephen L. Brown

Catherine H. Chase

Leslie M. Whitten

25 Calhoun Street, Suite 400, 29401

P. O. Box 993 Charleston, SC 29402

Telephone: (843) 577-4000

Facsimile: (843) 579-2983

E-Mail: sbrown@ycrlaw.com

cchase@ycrlaw.com

lwhitten@ycrlaw.com

Attorneys for the Respondent

Charleston County School District

Charleston, South Carolina

Dated: June 2, 2015

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

RECEIVED

JUN 04 2015

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SC Court of Appeals

J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2012-CP-10-5429

Sara Y. Wilson,

Appellant,

v.

Charleston County School District,

Respondent,

PROOF OF SERVICE

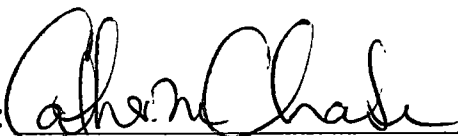
YOUNG CLEMENT RIVERS LLP
Stephen L. Brown
Catherine H. Chase
Leslie M. Whitten
25 Calhoun Street, Suite 400, 29401
P. O. Box 993, Charleston, SC 29402
Telephone: (843) 577-4000
Facsimile: (843) 579-2983
E-Mail: sbrown@ycrlaw.com
cchase@ycrlaw.com
lwhitten@ycrlaw.com
*Attorneys for the Respondent
Charleston County School District*

I, Catherine H. Chase, of Young Clement Rivers, LLP, counsel for the Respondent above named, do hereby certify that I have served the **Second Motion for Extension of Time to File/Serve Initial Brief of Respondent** on the above-named Appellant by depositing a copy of the same in the United States Mail, postage prepaid, on June 2, 2015, addressed as follows to their counsel of record:

Tiffany R. Spann-Wilder, Esquire
The Spann-Wilder Law Firm, L.L.C.
P. O. Box 70488
N. Charleston, SC 29415

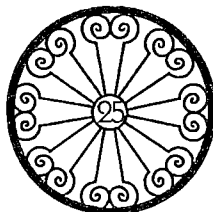
Blake A. Hewitt, Esquire
John S. Nichols, Esquire
Bluestein Nichols Thompson Delgado, LLC
P. O. Box 7965
Columbia, SC 29202

YOUNG CLEMENT RIVERS, LLP

By: 
Catherine H. Chase

Charleston, South Carolina

Dated: June 2, 2015



YCR LAW

Young Clement Rivers, LLP

CELEBRATING 50 YEARS OF LEGAL SERVICE

50 YEARS

Aimee M. Justman
Legal Assistant

Direct Dial: (843) 720-5460
Direct Fax: (843) 579-1385
E-mail: Ajustman@ycrlaw.com

June 2, 2015

VIA FACSIMILE AND US MAIL

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

JUN 04 2015

SC Court of Appeals

Re: Sara Y. Wilson v. Charleston County School District
Appellate Case No. 2014-002596
Case No.: 2014-002596
YCR File: 6959-20062070

Dear Ms. Kitchings:

Enclosed for service upon you, please find the original and seven (7) copies of a Third Motion for Extension of Time to File/Serve Initial Brief of Respondent, the original and two (2) copies of a Proof of Service regarding the same and a check in the amount of \$25.00 to cover the costs associated with this request.

Kindly file the original and return a court-stamped copy to me using the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Aimee M. Justman
Legal Assistant

/amj

Enclosures

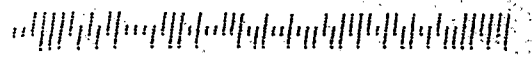
cc: Tiffany R. Spann-Wilder, Esquire, The Spann-Wilder Law Firm, L.L.C.
Blake A. Hewitt, Esquire, Bluestein Nichols Thompson Delgado, LLC
John S. Nichols, Esquire, Bluestein Nichols Thompson Delgado, LLC

FIRST CLASS

FIRST CLASS

FIRST CLASS

FIRST CLASS



Hasler

FIRST-CLASS MAIL

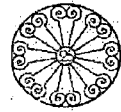
06/02/2015

US POSTAGE \$002.08⁰



ZIP 29401
011D12603180

FIRST CLASS MAIL



YCRLAW

25 Calhoun Street, Suite 400
P.O. Box 993
Charleston, SC 29402-0993

DDT
6959-
20062070

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
JUN 04 2015
SC Court of Appeals