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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Honorable Alison Renee Lee, Circuit Court Judge

Appellate Case No.: 2015-000613

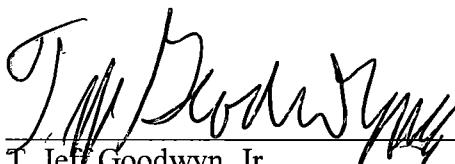
Richland County School District Two, Eric Barnes and Chuck Earles.....Appellants,

v.

Jeffrey Kennedy.....Respondent.

**RESPONDENT'S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL REPLY BRIEF**

Respondent hereby moves for an additional thirty (30) days in which to file its Initial Reply Brief that is currently due August 17, 2015 (since August 16, 2015 is a Sunday). This motion is based on the relative complexity of the issues on appeal that are involved in this case around an active trial schedule including multiple other appellate briefs being due in the next month.



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Attorneys for Respondent

July 20, 2015

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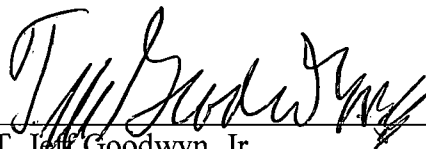
v.

Jeffrey Kennedy.....Respondent.

PROOF OF SERVICE

I certify that I have served the **Respondent's Motion for Extension of Time to File Initial Reply Brief** on Thomas K. Barlow, Counsel for the Appellants at the address below by depositing a copy of same in the United States Mail, postage prepaid, on July 21, 2015.

Thomas K. Barlow, Esquire
Kathryn Long Mahoney, Esquire
Childs & Halligan
P.O. Box 11367
Columbia, SC 29211-1367



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July 21, 2015

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July 20, 2015

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JUL 22 2015

SC Court of Appeals

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

RE: ***Richland County School District Two, Eric Barnes and Chuck Earles v. Jeffrey Kennedy***
Appellate Case No.: 2015-000613
Our File No.: 3000-0106

Dear Ms. Kitchings:

Our firm represents the Respondent, Jeffrey Kennedy in regard to the above-referenced appeal. This letter is to request an additional thirty (30) day extension to file and serve the Initial Reply Brief. By my calculations, the requested extension would give us until on or about September 15, 2015 to file and serve our initial reply brief. Also, enclosed is our firm's check in the amount of \$25.00 representing the required filing fees.

By copy of this letter, I am notifying counsel for the Appellants of my request for an additional thirty (30) days extension.

Thank you for your assistance with this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG/ms


Enclosure

cc: Thomas K. Barlow, Esquire
Jeffrey Kennedy

Goodwyn Law Firm, LLC
T. Jeff Goodwyn, Jr. Esq.
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Columbia, S.C. 29205

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