



THE LAW OFFICES OF
JAMES FLETCHER THOMPSON

LLC

CIVIL LITIGATION * ADOPTION * SURROGACY

78380

Locations

Spartanburg*

302 E. Saint John St.
Spartanburg, SC 29302
*Use for overnight mailing

Charleston

29X State St.
Charleston, SC 29401

Mailing Address

Post Office Box 1853
Spartanburg, SC 29304
Phone - 864.573.5533
Fax - 864.327.5139

website - www.JamesFletcherThompson.com
email - JamesFletcherThompson@gmail.com

January 8, 2016

(via email and US Mail)

RECEIVED
JAN 11 2016
SC Court of Appeals

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

RE: *BLH by parents/general guardians Kenneth and Angela Hensley, and on behalf of all others similarly situated v. South Carolina Department of Social Services*
Appellate Case No. 2014-002254 C.A. No. 2013-CP-42-1569

Dear Ms. Kitchings:

I write to respectfully request a thirty-day extension of time to file the Initial Brief of Respondent and Designation of Matter, or to otherwise file appropriate motions, for thirty days. It is my understanding that the Respondent's Initial Brief and Designation of Matter are due on January 19, 2016, and I am requesting that thirty-day extension due to a heavy trial schedule, including a contested termination of parental rights action in the Greenville County Family Court this week, as well as an appeal of a contested adoption wherein the Respondent's Brief is due on January 26, 2016, and for which no extension is typically granted, based on the order of Justice Toal's order of October 20, 2011.

I have talked with Mr. Lindemann who consents to this extension. (See attached.)

Sincerely,


JAMES FLETCHER THOMPSON

JFT/mhw

Enclosure - Check for \$25; email

Cc (via email): Andrew F. Lindemann, Esq.
Joel S. Hughes, Esq.
T. Ryan Langley, Esq.

From: Jim Thompson [jamesfletcherthompson@gmail.com]
Sent: Friday, January 08, 2016 4:18 PM
To: Mary Waldrop
Subject: Fwd: Extension

James Fletcher Thompson
James Fletcher Thompson LLC
PO Box 1853
Spartanburg, SC 29304
864-573-5533
www.jamesfletcherthompson.com

Begin forwarded message:

From: Andrew Lindemann <alindemann@dml-law.com>
Date: January 8, 2016 at 12:42:15 PM EST
To: Jim Thompson <jamesfletcherthompson@gmail.com>
Cc: Ryan lanley <RLangley@hodgelawfirm.com>
Subject: RE: Extension

No problem. The Appellant consents to the extension.

Andrew

-----Original Message-----

From: Jim Thompson [<mailto:jamesfletcherthompson@gmail.com>]
Sent: Friday, January 08, 2016 12:31 PM
To: Andrew Lindemann
Cc: Ryan lanley
Subject: Extension

Dear Andrew,

Will you consent to a 30 day extension on our response to your initial brief? That response may be the filing of an initial reply brief or possibly a motion to dismiss. Thank you for considering this request and I hope you have a good weekend. Jim

James Fletcher Thompson
James Fletcher Thompson LLC
PO Box 1853
Spartanburg, SC 29304
864-573-5533
www.jamesfletcherthompson.com

