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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Robert Hood, Circuit Court Judge

RECEIVED

MAR 21 2016

Case No. 2014-CP-40-2209

SC Court of Appeals

James Chaffin and Marietta Chaffin, ..... Appellants,

v.

Richland County Sheriff's Department, Deputy Brian Metz,  
Investigator Roy Livingston, Tallie and Devra Lackey,  
individually and as the Parents to the minor M.G., ..... Respondents.

**MOTION FOR EXTENSION  
TO FILE INITIAL BRIEF OF RESPONDENTS**

The Respondents Richland County Sheriff's Department and Brian Metz respectfully move this Court for an additional extension of time until March 24, 2016, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.


These Respondents' motion is based on the following grounds:

1. The Initial Brief of the Respondents Richland County Sheriff's Department and Brian Metz is currently due to be filed and served on March 17, 2016.

2. The undersigned counsel for the Respondents Richland County Sheriff's Department and Brian Metz requires additional time to complete the preparation of the Initial Brief of Respondents and their Designation of Matter to be Included in the Record on Appeal because other obligations and deadlines that have prevented him from completing this brief by the current deadline. Specifically, the undersigned counsel has had two federal court summary judgment motions due on March 14th and 15th, and two additional federal court summary judgment motions due on March 18th. In addition, the undersigned counsel has a Court of Appeals brief and a Supreme Court brief due on March 21st and oral argument in the Supreme Court on March 22nd.

WHEREFORE, the Respondents Richland County Sheriff's Department and Brian Metz respectfully request that they be allowed until March 24, 2016, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

DAVIDSON & LINDEMANN, P.A.

BY:  \_\_\_\_\_

ANDREW F. LINDEMANN  
1611 Devonshire Drive  
Post Office Box 8568  
Columbia, South Carolina 29202  
(803) 806-8222

*Counsel for Respondents Richland County  
Sheriff's Department and Brian Metz*

Columbia, South Carolina

March 17, 2016

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**CERTIFICATE OF SERVICE**

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The undersigned employee of Davidson & Lindemann, P.A., counsel for the Respondents Richland County Sheriff's Department and Brian Metz, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Respondents** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 17th day of March 2016:

Aimee J. Zmroczek, Esquire  
A.J.Z. Law Firm, LLC  
Post Office Box 11961  
Columbia, South Carolina 29211

John S. Simmons, Esquire  
John L. Warren, III, Esquire  
Simmons Law Firm, LLC  
1711 Pickens Street  
Columbia, South Carolina 29202



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# DAVIDSON & LINDEMANN, P.A.

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†Certified Mediator

March 17, 2016

Of Counsel  
Kenneth P. Woodington

Writer's Email: [alindemann@dml-law.com](mailto:alindemann@dml-law.com)

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

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RE: James Chaffin and Marietta Chaffin v. Richland County Sheriffs Department, Deputy Brian Metz, Investigator Roy Livingston, Tallie and Devra Lackey, Individually and as the parents to minor M.G.  
Appellate Case Number: 2015-001754  
Civil Action Number: 2014-CP-40-2209  
Our File Number: 314.9428

Dear Ms. Kitchings:

Please find enclosed for filing the originals and seven copies copy of the **Motion for Extension of Time to File Initial Brief of Respondents** in the above referenced matter. Please file the original and return a clocked-in copy to me in the enclosed envelope.

By copy of this letter, I am serving copies on all counsel of record. Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb  
Enclosures

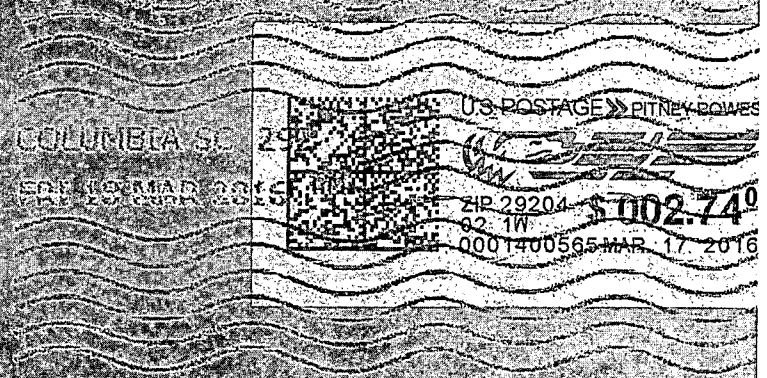
The Honorable Jenny Abbott Kitchings  
March 17, 2016  
Page Two

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cc: (w/ Enclosure)

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