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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 29 2016

SC Court of Appeals

Case No. 2014-CP-40-2209

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 brief extension of time until March 28, 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 Respondents Richland County Sheriff's Department and Brian Metz had previously requested an extension until March 24, 2016. That extension request is still pending.

2. The undersigned counsel for the Respondents Richland County Sheriff's Department and Brian Metz was unable to complete the brief by March 24, 2016 because he learned late on that date that Judge Kristi Harrington had set nineteen motions for a hearing in a construction defect case in which counsel is involved for the following day, March 25, 2016, in Charleston.. That motion hearing did not appear on any roster, and counsel was not given prior notice of that hearing. Accordingly, counsel is asking for additional time to complete this brief so he could properly prepare for the motion hearing in the construction defect case.

3. Since the previous extension request is still pending, this motion is likely unnecessary but is be filed as a precautionary measure.

WHEREFORE, the Respondents Richland County Sheriff's Department and Brian Metz respectfully request that they be allowed until March 28, 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 24, 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 24th 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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**SC Court of Appeals**



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DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

William H. Davidson, II  
Andrew F. Lindemann\*  
James M. Davis, Jr.†  
Robert D. Garfield  
Michael B. Wren

1611 Devonshire Drive, Second Floor  
Post Office Box 8568  
Columbia, South Carolina 29202-8568  
Telephone: (803) 806-8222  
Facsimile: (803) 806-8855  
www.dml-law.com

Daniel C. Plyler  
Joel S. Hughes  
David A. DeMasters  
Steven R. Spreeuwiers  
Todd R. Flippin

\*Also Admitted In North Carolina  
†Certified Mediator

March 24, 2016

Of Counsel  
Kenneth P. Woodington

Writers Email: alindemann@dml-law.com  
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The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

MAR 29 2016

SC Court of Appeals

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. A \$25 check is enclosed for the filing fee.

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 24, 2016  
Page Two

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cc: (w/ Enclosures)

Aimee J. Zmroczek, Esquire  
A.J.Z. Law Firm, LLC  
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John L. Warren, III, Esquire  
Simmons Law Firm, LLC  
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Columbia, South Carolina 29202



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Davidson & Lindemann, P.A.  
Post Office Box 8568  
Columbia, South Carolina 29202-8568

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