

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM SPARTANBURG COUNTY
Brian M. Gibbons, Circuit Court Judge

MAR 17 2016

SC Court of Appeals

Case No. 2013-CP-42-1569

BLH by parents/general guardians Kenneth and
Angela Hensley, and on behalf of all others similarly
situated, Respondent,

v.

South Carolina Department of Social Services, Appellant.

**MOTION FOR EXTENSION OF TIME
TO FILE INITIAL REPLY BRIEF**

The Appellant South Carolina Department of Social Services respectfully
moves this Court for an extension of time until March 21, 2016, by which to file and
serve its Initial Reply Brief and Designation of Matter to be Included in the Record
on Appeal.

The Appellant's motion is based on the following grounds:

1. The Initial Reply Brief is currently due to be filed and served on March 10, 2016.

2. The undersigned counsel for the Respondents requires additional time to complete the preparation of the Initial Reply Brief and its 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, including a brief due in the United States Supreme Court and a lengthy mediation in a complex construction defect case. In addition, the undersigned counsel's firm has two week-long, date certain cases going to trial the week of March 14, 2016 in Richland County, and the undersigned is actively involved in trial preparation for those cases.

3. Counsel for the Appellant has attempted to consult with opposing counsel. Although no response has yet been received, based on past experience, both sides have graciously consented to prior extension requests.

WHEREFORE, the Appellant respectfully requests that they be allowed until March 21, 2016, by which to file and serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

DAVIDSON & LINDEMANN, P.A.

BY:  _____

ANDREW F. LINDEMANN
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Post Office Box 8568
Columbia, South Carolina 29202
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*Counsel for Appellant South Carolina
Department of Social Services*

Columbia, South Carolina

March 10, 2016

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CERTIFICATE OF SERVICE

The undersigned employee of Davidson & Lindemann, P.A., counsel for the Appellant, does hereby certify that service of the **Motion for Extension of Time to File Initial Reply Brief** in the above-captioned matter was made upon all counsel of record by placing a copy in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 10th day of March 2016:

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Post Office Box 2765
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March 10, 2016

Of Counsel
Kenneth P. Woodington

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MAR 17 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 (dob 2/20/97) 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
Civil Action Number: 2013-CP-42-1569
Our File Number: 103.8851

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Motion for Extension of Time to File Initial Reply Brief** in the above referenced matter. Please file the original and return a clocked-in copy to me in the enclosed envelope. I am not enclosing a filing fee because the Appellant is a state agency.

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

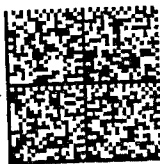
AFL/jmb
Enclosures

The Honorable Jenny Abbott Kitchings
March 10, 2016
Page Two

cc: (w/ Enclosure)

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