

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson Jr., Circuit Court Judge

Case No. 2016-001337

RECEIVED

JUL 19 2016

SC Court of Appeals

Leisel ParadisAppellant

v.

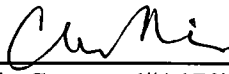
Charleston County School District, James Island Charter High School, Robert Bohnstengel, and
Stephanie Spann, in their individual capacities,Respondents.

**MOTION FOR FIRST EXTENSION TO FILE
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER**

The Appellant, Leisel Paradis, through her undersigned counsel, hereby requests of this Honorable Court an extension of time in which to file Appellant's Initial Brief and Designation of Matter in the above referenced matter. The undersigned's office received the Transcript of the Record from Ruth Weese, Circuit Court Reporter, on July 7, 2016. Pursuant to Rules 208 & 209, SCACR, Appellant's Initial Brief and Designation of Matter are due August 5, 2016. Appellant's Counsel will be leaving the firm of J. Lewis Cromer and Associates, LLC, and is in the course of transferring and reassigning cases to other counsel within her firm. These obligations, among others, necessitate an extension of time in order for the undersigned firm to prepare the Appellant's Initial Brief and Designation of Matter. The undersigned certifies that she spoke with Respondents' counsel who consent to this motion.

Pursuant to the grounds listed above, the undersigned respectfully requests a thirty (30) day extension in which to prepare Appellant's Initial Brief and Designation of Matter. A thirty (30) day extension would move this deadline to September 5, 2016.

J. LEWIS CROMER & ASSOCIATES, L.L.C.

BY: 
J. Lewis Cromer (#1470)
Chelsea R. Rikard (#102355)
Post Office Box 11675
Columbia, South Carolina 29211
Phone 803-799-9530
Fax 803-799-9533

Attorneys for Appellant

July 19, 2016
Columbia, SC

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Leisel Paradis Appellant

v.

Charleston County School District, James Island Charter High School, Robert Bohnstengel, and
Stephanie Spann, in their individual capacities

, Respondents.

PROOF OF SERVICE

I certify that I, the undersigned employee of J. Lewis Cromer & Associates, L.L.C.,
caused to have served **APPELLANT'S MOTION FOR FIRST EXTENSION TO FILE
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER** on counsel for
Respondent by depositing a copy of it in the United States Mail, postage prepaid, on July 19,
2016, addressed to Rene S. Dukes, Esquire of Rosen, Rosen, & Hagood, LLC, PO Box 893,
Charleston, SC 29402 and Bob J. Conley of Cleveland & Conley, LLC, 171 Church St., Suite
310, Charleston, SC 29401.

[Signature Block on Next Page.]

BY: Melinda Young
Melinda Young, Litigation Paralegal
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July 19, 2016

**J. LEWIS CROMER
& ASSOCIATES L.L.C.**

ATTORNEYS AND COUNSELORS AT LAW

J. Lewis Cromer
Julius W. Babb, IV · J. Paul Porter
Ryan K. Hicks · Shannon M. Polvi · Chelsea R. Rikard

July 19, 2016

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VIA HAND-DELIVERY

Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

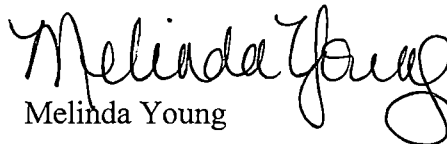
RE: *Leisel Paradis v. Charleston County School District, et al.*
Case No. 2016-001337

Dear Ms. Kitchings:

Enclosed for filing are the original and two (2) copies of the Appellant's for First Extension of Time in the above referenced matter, along with the Proof of Service. Also, enclosed is our check in the amount of \$25.00 for the filing fee. Please file and return the clocked copies to our administrative assistant.

Please feel free to contact me should you have any questions.

Sincerely,


Melinda Young

Enclosures

cc: Rene S. Dukes, Esquire
Rosen, Rosen, & Hagood, LLC
P.O. Box 893
Charleston, SC 29402

Bob J. Conley, Esquire
Cleveland & Conley, LLC
171 Church Street, Suite 310
Charleston, SC 29401