

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUL 22 2016

SC Court of Appeals

APPEAL FROM JASPER COUNTY
Court of Common Pleas

The Honorable Carmen T. Mullen, Fourteenth Judicial Circuit
Case No.: 2013-CP-27-327

Appellate Case No.: 2014-002612

Randy Horton.....Appellant

-vs-

Jasper County School District.....Respondent

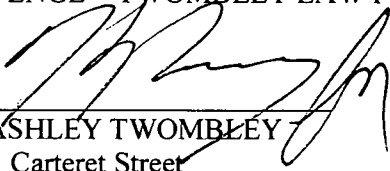
**APPELLANT'S FIRST MOTION FOR EXTENSION TO FILE
PETITION WRIT FOR CERTIORARI**

Appellant's Petition for Writ of Certiorari is currently due on July 25, 2016. The attorney primarily handling the prepare of the Petition for Writ of Certiorari has been on vacation for over a week and accordingly the Appellant respectfully requests a seven (7) day extension to serve and file the Petition for Writ of Certiorari. This extension would make the Petition for Rehearing due on or before August 1, 2016. Counsel for Respondent has no objection to Appellant's request for a continuance as evidenced by the email communication attached hereto as Exhibit A.

Respectfully submitted,

TWENGE + TWOMBLEY LAW FIRM

BY:



J. ASHLEY TWOMBLEY
311 Carteret Street
Beaufort, SC 29902
Telephone: (843) 982-0100
Facsimile: (843) 982-0103
www.twlawfirm.com
ATTORNEYS FOR APPELLANT

Beaufort, South Carolina

July 20, 2016

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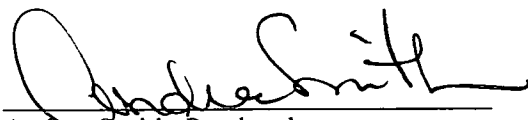
Jasper County School District.....Respondent

AFFIDAVIT OF SERVICE

The undersigned, Andrea Smith, hereby avers that she is a Paralegal with TWENGE + TWOMBLEY LAW FIRM, Attorneys for Appellant, and that on the 20th day of July 2016, a true and accurate copy of the attached Appellant's First Motion for Extension to File Petition for Writ of Certiorari was placed in an envelope with first class postage thereon prepaid through the United States Postal Service and mailed to the following:

Dwayne T. Mayzck, Esquire
CHILDS & HALLIGAN, P.A.
1301 Gervais Street, Suite 900
P.O. Box 11367
Columbia, SC 29211-1367
Telephone: (803) 254-4035
Facsimile: (803) 771-4422
dmazyck@childs-halligan.net
Attorney for Respondent

BY:



Andrea Smith, Paralegal to
TWENGE + TWOMBLEY LAW FIRM

EXHIBIT A

Andrea Smith

From: Dwayne T. Mazyck <dmazyck@childs-halligan.net>
Sent: Wednesday, July 20, 2016 11:03 AM
To: Andrea Smith
Subject: RE: Horton v. Jasper County School District

No objection, thanks.

From: Andrea Smith [mailto:andrea@twlawfirm.com]
Sent: Wednesday, July 20, 2016 9:40 AM
To: Dwayne T. Mazyck
Cc: Ashley Twombly; Jennifer Campbell
Subject: RE: Horton v. Jasper County School District

Mr. Mazyck –

Appellant's Petition for Writ of Certiorari is due on Monday and Mr. Twombly would like to obtain a 7 day extension to file and serve the Petition due to scheduling conflicts.

Do you have any objection to Appellant's request for a 7 day extension to file his Petition for Writ of Certiorari?

We would like to advise the court whether you have an objection or not.

Thank you for your consideration in this matter.

Andrea

Andrea Smith
Paralegal to J. Ashley Twombly
Twenge + Twombly Law Firm
311 Carteret Street
Beaufort, SC 29902
Telephone: (843) 982-0100
Facsimile: (843) 982-0103
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**TWENGE & TWOMBLEY, LLC
OPERATING ACCOUNT**

311 CARTERET STREET
BEAUFORT, SC 29902

67-604/539

300

CHECK NUMBER

Jul 20, 2016

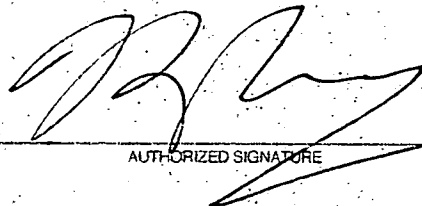
PAY TO THE ORDER OF S.C. Supreme Court

\$ 25.00

*** Twenty Five ***** 00/100

DOLLARS

S.C. Supreme Court



MEMO: Motion for Extension to File Petition for Writ of Certiorari / #1854 / als

AUTHORIZED SIGNATURE

⑈006926⑈ ⑆05390604⑆ ⑆290004⑆ ⑆2601⑈

TWENGE & TWOMBLEY, LLC

OPERATING ACCOUNT

6926

DATE : July 20, 2016
CHE # : 6926
AMOUNT : \$25.00
ACCOUNT : 1
PAID TO : S.C. Supreme Court

EXPLANATION : Motion for Extension to File Petition for Writ of Certiorari / #1854 / als

CLIENT : Horton, Randy
MATTER : 1854

TWENGE + TWOMBLEY LAW FIRM

311 CARTERET STREET
BEAUFORT, SOUTH CAROLINA 29902
PH: 843.982.0100 + FX: 843.982.0103
WEB: TWLAWFIRM.COM

J. ASHLEY TWOMBLEY
KARL D. TWENGE
JENNIFER I. CAMPBELL

LICENSED IN SC - GA
OF COUNSEL

July 20, 2016

RECEIVED

JUL 22 2016

SC Court of Appeals

Via U.S. Mail

The Honorable Daniel E. Shearouse
Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RE: Randy Horton v. Jasper County School District
Appellate Case No.: 2014-002612

Dear Mr. Shearouse:

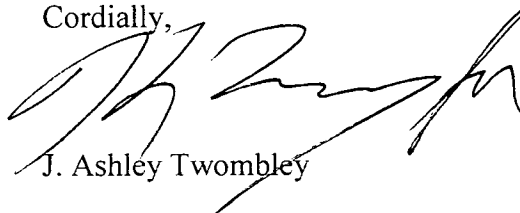
Please find enclosed an original unbound and seven (7) bound copies of Appellant's First Motion for Extension to file Petition for Writ of Certiorari in the referenced matter. I would appreciate it if you would file the original and six (6) copies and return a clocked copy to me. Enclosed is a check in the amount of \$25.00, which represents the requisite filing fee.

By copy of this letter, I am serving a copy of the same upon The Honorable Jenny Abbott Kitchings, the Clerk of the Court of Appeals as well as opposing counsel, Dwayne T. Mayzck, Esquire. Mr. Mayzck, Counsel for Respondent, has no objection to Appellant's request for extension, as evidenced by the email communication attached to Appellant's motion.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

With kindest regards, I remain,

Cordially,



J. Ashley Twombley

cc: The Honorable Jenny Abbott Kitchings
Dwayne T. Mayzck, Esquire

TWENGE + TWOMBLY LAW FIRM LLC

311 CARTERET STREET
BEAUFORT, SOUTH CAROLINA 29902
PH: 843.982.0100 + FX: 843.982.0103

WEB: TWLAWFIRM.COM

CHARLESTON SC 294

20 JUL 2016 PM 11



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USA
NON-MACHINABLE SURCHARGE

JUL 22 2016
SC Court of Appeals

The Honorable Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

29211+1629

