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IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2016-001337

RECEIVED  
SEP 23 2016  
SC Court of Appeals

Leisel Paradis,

Appellant,

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 RESPONDENTS' INITIAL BRIEF**

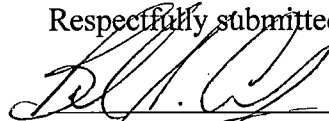
Respondents Charleston County School District, James Island Charter High School,  
Robert Bohnstengel and Stephanie Spann, in their individual capacities, through their  
undersigned counsel, hereby request an extension of time to file Respondents' Initial Brief.  
Appellant served her Initial Brief on Respondents on September 6, 2016. Pursuant to Rule  
208, SCACR, Respondents' Initial Brief is due on October 6, 2016.

Given the respective obligations of Respondents' counsel, an extension of time for  
Respondents' counsel to prepare and submit Respondents' Initial Brief is requested, pursuant

to Rule 265(b), SCACR. Respondents' counsel certify they consulted with Appellant's counsel before filing this Motion and Appellant's counsel consents to the requested extension.

For the reasons above, Respondents' counsel respectfully requests a thirty-day extension of time, until November 7, 2016, to file and serve Respondents' Initial Brief.

Respectfully submitted,



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Attorneys for James Island Charter High  
School and Stephanie Spann, in her  
individual capacity



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Attorney for Charleston County School  
District and Robert Bohnstengel, in his  
individual capacity

September 20, 2016

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable J.C. Nicholson, Jr., Circuit Court Judge

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Case No. 2016-001337

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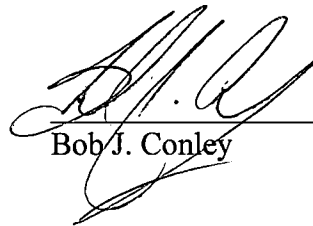
**PROOF OF SERVICE OF MOTION FOR FIRST EXTENSION TO FILE  
RESPONDENTS' INITIAL BRIEF**

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I hereby certify that on September 20, 2016, I served a copy of the Motion for First Extension to File Respondents' Initial Brief on the following:

J. Lewis Cromer  
J. Paul Porter  
J. LEWIS CROMER & ASSOCIATES, LLC  
1418 Laurel Street, Suite A  
P. O. Box 11675  
Columbia, SC 29211

by placing a copy of said document in the United States mail with sufficient postage thereon.



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Bob J. Conley

Charleston, South Carolina

Date: September 20, 2016

CLEVELAND & CONLEY, L.L.C.  
LABOR AND EMPLOYMENT DEFENSE

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†CERTIFIED SPECIALIST,  
LABOR & EMPLOYMENT LAW

September 20, 2016

RECEIVED

SEP 23 2016

SC Court of Appeals

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

Re: *Leisel Paradis v. Charleston County School District, James Island Charter High School, Robert Bohnstengel and Stephanie Spann, in their individual capacities*  
Case No.: 2016-001337

Dear Ms. Kitchings:

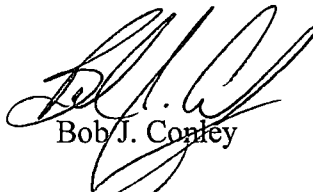
Enclosed for filing is the original and seven copies of Respondents' Motion for First Extension to File Respondents' Initial Brief. Also enclosed is the original and one copy of the Proof of Service of Respondents' Motion for First Extension to File Respondents' Initial Brief on the Appellant. Finally, we are enclosing a check in the amount of \$25.00 for the filing fee.

Please return a file-stamped copy of Respondents' Motion for First Extension to File Respondents' Initial Brief and a file-stamped copy of the Proof of Service of Respondents' Motion for First Extension to File Respondents' Initial Brief on the Appellant, in the enclosed, stamped envelope.

If you need any additional information, please let us know.

Yours truly,

CLEVELAND & CONLEY, LLC

  
Bob J. Conley

BJC/jgb

Enclosures: as stated

cc: J. Paul Porter, Esquire  
Rene Dukes, Esquire

J

