

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Doyet A. Early, Circuit Court Judge

Case No. 2014-CP-40-6297

RECEIVED
OCT 14 2016
SC Court of Appeals

Do Yeon Kim,

Appellant,

v.

County of Richland, Richland County Sheriff's
Department, and Leon Lott in his Official Capacity as
Sheriff of Richland County.....

Respondents.

**MOTION FOR EXTENSION TO
FILE INITIAL BRIEF**

The Respondents respectfully move this Court for an additional ten day extension of time until October 27, 2016, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

The Respondents' motion is based on the following grounds:

1. The Initial Brief is currently due to be filed and served on October 17, 2016.

2. The undersigned counsel for the Respondents requires this additional time to prepare the Respondents' Initial Brief because of other obligations and deadlines including another brief due to the Court of Appeals on October 17, 2016, as well as three briefs due in the Supreme Court on that same date.

3. Counsel for the Appellant has been consulted and has consented to the requested extension. (See attached email).

WHEREFORE, the Respondents respectfully request that they be allowed until October 27, 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

Columbia, South Carolina

October 14, 2016

Andrew Lindemann

From: Robert Dodson <rdodson@rdodsonlaw.com>
Sent: Friday, October 14, 2016 1:35 PM
To: Andrew Lindemann
Cc: Lindsay Protopapas
Subject: RE: Kim v. Richland County appeal

I consent. Have a good weekend.
Robert

Robert D. Dodson, Esquire
Law Offices of Robert Dodson, P.A.
1722 Main Street, Suite 200
Columbia, South Carolina 29201
Telephone: (803) 252-2600
Facsimile: (803) 771-2259
rdodson@rdodsonlaw.com
www.robertdodsonlaw.com
<https://www.facebook.com/robertdodsonlaw>
<https://www.twitter.com/robertdodsonlaw>
http://www.linkedin.com/profile/view?id=192464797&locale=en_US&trk=tab_pro

From: Andrew Lindemann [<mailto:alindemann@DML-LAW.com>]
Sent: Friday, October 14, 2016 1:24 PM
To: Robert Dodson
Subject: Kim v. Richland County appeal
Importance: High

Robert:

Hope you are doing Ok. I have a favor to ask on this appeal. I have four briefs due Monday in the two appellate courts, and for that reason, I am planning to ask for an additional ten days in this case to get my initial brief filed. Would you kindly consent to that request.

I will certainly return the favor on the reply brief if you need it.

Thanks.

Andrew

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SC Court of Appeals

Do Yeon Kim, Appellant,

v.

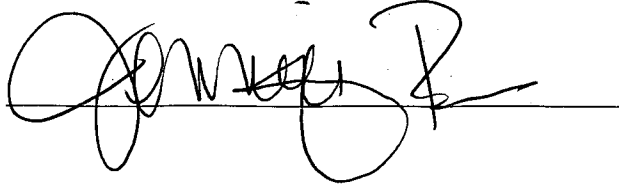
County of Richland, Richland County Sheriff's
Department, and Leon Lott in his Official Capacity as
Sheriff of Richland County..... Respondents.

CERTIFICATE OF SERVICE

The undersigned employee of Davidson & Lindemann, P.A., counsel for the Respondents, does hereby certify that service of the **Motion for Extension to File Initial Brief** 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 envelope this the 14th day of October 2016:

Robert D. Dodson, Esquire
Law Offices of Robert Dodson, P.A.
1722 Main Street - Suite 200
Columbia, South Carolina 29201

Thomas F. Dougall, Esquire
Dougall & Collins
1700 Woodcreek Farms Road - Suite 100
Elgin, South Carolina 29042

A handwritten signature in black ink, appearing to read 'Tom Dougall', written over a horizontal line.

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

October 14, 2016

Daniel C. Plyler
Joel S. Hughes
David A. DeMasters
Steven R. Spreuwers
Brandon M. Briggs
Jasmine D. Wyman

*Also Admitted In North Carolina
†Certified Mediator

Of Counsel
Kenneth P. Woodington

Writer's Email: alindemann@dml-law.com

Hand Delivered

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

RECEIVED

OCT 14 2016

SC Court of Appeals

RE: Do Yeon Kim v. County of Richland, Richland County Sheriff's Department, and Leon Lott in his Official Capacity as Sheriff of Richland County
Appellate Case Number: 2016-000713
Civil Action Number: 2014-CP-40-6297
Our File Number: 314.9563

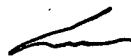
Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Motion for Extension to File Initial Brief** in the above referenced matter. Please file the original and return a clocked-in copy to me in the enclosed envelope. I have also enclosed my firm's \$25.00 check 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
Enclosure

cc: Robert D. Dodson, Esquire (w/ Enclosure)
Thomas F. Dougall, Esquire (w/ Enclosure)

✓