

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Jocelyn Newman, Circuit Court Judge

Appellate Case No. 2016-002503  
Case No. 2015-CP-40-2679

RECEIVED

MAY 18 2017

SC Court of Appeals

Valeria Farr, .....

Appellant,

v.

Leon Lott in his capacity as Richland County Sheriff  
and the Richland County Sheriff's Office, .....

Respondents.

**RESPONDENTS' MOTION FOR  
EXTENSION TO FILE INITIAL BRIEF**

The Respondents respectfully move this Court for an additional extension of time until June 2, 2017, 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 Respondents' Initial Brief is currently due to be filed and served on May 19, 2017.

2. The undersigned counsel for the Respondents requires this additional time to prepare the Respondent's Initial Brief because of other obligations and deadlines, which includes two recent briefs filed with the Fourth Circuit Court of Appeals on May 8, 2017 and May 9, 2017, as well as oral argument at the Court of Appeals in a complex class action on May 11, 2017. In addition, the undersigned counsel has been out of the office due to illness for three days, May 15-16, 2017, which has also delayed his ability to meet the current deadline.

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 June 2, 2017, 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

May 18, 2017

## Andrew Lindemann

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**From:** mark mwhardee <mwhardee@bellsouth.net>  
**Sent:** Tuesday, May 16, 2017 12:59 PM  
**To:** Andrew Lindemann  
**Subject:** Re: Farr v. Lott appeal

Of course. Congratulations to your son.

Sent from Mark W. Hardee's iPhone

On May 16, 2017, at 12:42 PM, Andrew Lindemann <[alindemann@DML-LAW.com](mailto:alindemann@DML-LAW.com)> wrote:

Mark:

I have a favor to ask. Would you consent to an additional 14 day extension for me to file the Initial Brief of Respondent. I have been out of the office sick the past two days, plus my son is graduating from high school next week which will take me away from work for awhile.

Thanks.

Andrew

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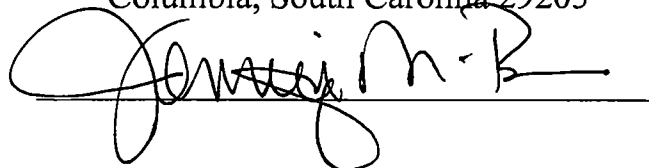
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**CERTIFICATE OF SERVICE**

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The undersigned employee of Davidson & Lindemann, P.A., counsel for the Respondents, does hereby certify that service of **Respondents' Motion for Extension to File Initial Brief** in the above-captioned matter was made upon Appellant's counsel by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 18th day of May 2017:

Mark W. Hardee, Esquire  
2231 Devine Street - Suite 202  
Columbia, South Carolina 29205



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DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

William H. Davidson, II  
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May 18, 2017

Daniel C. Plyler  
Joel S. Hughes  
David A. DeMasters  
Steven R. Spreeuwiers  
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](mailto: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

RE: Valeria Farr v. Leon Lott in his capacity as Richland County Sheriff and the  
Richland County Sheriff's Office  
Appellate Case Number: 2016-002503  
Civil Action Number: 2015-CP-40-2679  
Our File Number: 314.9694

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of **Respondents' Motion for Extension to File Initial Brief** in the above referenced matter. Please file the original and return a clocked-in copy to me by way of my courier. 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: Mark W. Hardee, Esquire (w/ Enclosure)

RECEIVED

MAY 18 2017

SC Court of Appeals

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