

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Robin B. Stillwell, Circuit Court Judge

RECEIVED

MAY 22 2017

SC Court of Appeals

Appellate Case No. 2016-000548
Case No. 2013-CP-23-6522

Madel C. Rivero, as Personal Representative for the
Estate of Lilia Lorena Blandin, Respondent,

v.

Sheriff Steve Loftis, in his capacity as
Sheriff of Greenville County, Appellant.

**APPELLANT'S MOTION FOR
EXTENSION TO FILE INITIAL REPLY BRIEF**

The Appellant Sheriff Steve Loftis respectfully moves this Court for an additional extension of time until June 1, 2017, by which to file and serve his Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellant's motion is based on the following grounds:

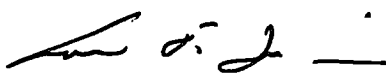
1. The Appellant's Initial Reply Brief is currently due to be filed and served on May 22, 2017.

2. The undersigned counsel for the Appellant requires this additional time to prepare the Initial Reply Brief because of other obligations and deadlines. Additionally, counsel has been out of the office due to illness for most of past week and has not yet fully recovered. This illness has delayed his ability to meet the current deadline.

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

WHEREFORE, the Appellant respectfully requests that he be allowed until June 1, 2017, by which to file and serve his Initial Reply 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

-and-

RUSSELL W. HARTER, JR.
CARLY H. DAVIS
CHAPMAN, HARTER
& HARTER, P.A.
Post Office Box 10224
Greenville, South Carolina 29603
(864) 233-4500

*Counsel for Appellant
Sheriff Steve Loftis*

May 22, 2017

Andrew Lindemann

From: John Nichols <jsnichols@bntdlaw.com>
Sent: Monday, May 22, 2017 10:02 AM
To: Andrew Lindemann
Cc: Erin Bridges
Subject: RE: Rivero v. Loftis

Andrew

No sweat. Tell them we consulted and consent.

Have you seen a doctor? Don't underestimate sickness, man. Get on something and get rest! You've been burning the candle at all ends. I saw Garrett's email in the Morris case, and I'll help keep that one managed.

Life's too short to kill yourself for no good reason!

If there's anything else you need just holler.

Best,

J

John S. Nichols
Bluestein Nichols Thompson & Delgado, LLC
PO Box 7965 (29202)
1614 Taylor Street (29201)
Columbia, SC
(803) 779-7599 ext 115
jsnichols@bntdlaw.com

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

---

**From:** Andrew Lindemann [<mailto:alindemann@DML-LAW.com>]  
**Sent:** Monday, May 22, 2017 9:47 AM  
**To:** John Nichols  
**Subject:** Rivero v. Loftis

John:

I will need to request another 10 day extension for my Initial Reply Brief. I have been sick for a week now and have been trying to work through it but not terribly successfully. I would appreciate your consent.

Thanks.

Andrew

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Robin B. Stillwell, Circuit Court Judge

---

Appellate Case No. 2016-000548  
Case No. 2013-CP-23-6522

---

RECEIVED

MAY 22 2017

SC Court of Appeals

Madel C. Rivero, as Personal Representative for the  
Estate of Lilia Lorena Blandin, ..... Respondent,

v.

Sheriff Steve Loftis, in his capacity as  
Sheriff of Greenville County, ..... Appellant.

---

**CERTIFICATE OF SERVICE**

---

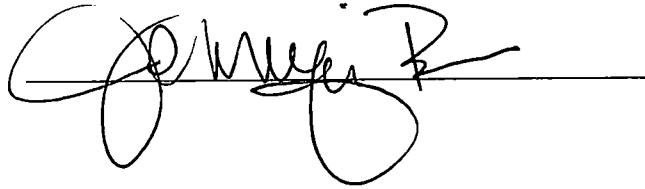
The undersigned employee of Davidson & Lindemann, P.A., counsel for the Appellant, does hereby certify that service of **Appellant's Motion for Extension to File Initial Reply Brief** in the above-captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 22nd day of May 2017:

Daniel J. Farnsworth, Jr., Esquire  
Brann W.M. Fowler, Esquire  
Farnsworth Law Offices, LLC  
Post Office Box 8719  
Greenville, South Carolina 29604

Daniel W. Luginbill, Esquire  
J. Christopher Wilson, Esquire  
Wilson & Luginbill, LLC  
Post Office Box 1150  
Bamberg, South Carolina 29003

John S. Nichols, Esquire  
Bluestein Nichols Thompson  
& Delgado, LLC  
Post Office Box 7965  
Columbia, South Carolina 29202

Russell W. Harter, Jr., Esquire  
Carly H. Davis, Esquire  
Chapman, Harter & Harter, P.A.  
Post Office Box 10224  
Greenville, South Carolina 29603

A handwritten signature in black ink, appearing to read "Daniel W. Luginbill", is written over a horizontal line. The signature is stylized and cursive.

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

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

\*Also Admitted In North Carolina  
†Certified Mediator

May 22, 2017

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

RECEIVED

MAY 22 2017

SC Court of Appeals

RE: Madel C. Rivero, as Personal Representative for the Estate of Lilia Lorena Blandin v.  
Sheriff Steve Loftis, in his capacity as Sheriff of Greenville County  
Appellate Case Number: 2016-000548  
Civil Action Number: 2013-CP-23-6522  
Claim Number: 03841  
Our File Number: 104.9842


Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of **Appellant's Motion for Extension to File Initial Reply 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  
Enclosures

↓

The Honorable Jenny Abbott Kitchings  
May 22, 2017  
Page Two

---

cc: (w/ Enclosure)

Daniel J. Farnsworth, Jr., Esquire  
Brann W.M. Fowler, Esquire  
Farnsworth Law Offices, LLC  
Post Office Box 8719  
Greenville, South Carolina 29604

Daniel W. Luginbill, Esquire  
J. Christopher Wilson, Esquire  
Wilson & Luginbill, LLC  
Post Office Box 1150  
Bamberg, South Carolina 29003

John S. Nichols, Esquire  
Bluestein Nichols Thompson  
& Delgado, LLC  
Post Office Box 7965  
Columbia, South Carolina 29202

Russell W. Harter, Jr., Esquire  
Carly H. Davis, Esquire  
Chapman, Harter & Harter, P.A.  
Post Office Box 10224  
Greenville, South Carolina 29603