

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM MARION COUNTY
COURT OF COMMON PLEAS
THE HONORABLE THOMAS A. RUSSO
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2017-000210
CIVIL ACTION NO. 2015-CP-33-140

Vanessa Blackwell, a/k/a
Jacqueline Blackwell,

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JUL 10 2017

SC Court of Appeals

RESPONDENT,

versus

Andrew J. Herring, Individually, and as an
employee/agent of Marion County Sheriff's
Department; and Marion County Sheriff's Department,

DEFENDANTS,

Of which Marion County Sheriff's Department is the

APPELLANT.

MOTION FOR EXTENSION OF TIME

The Initial Brief of Appellant, Marion County Sheriff's Department, and Designation of Matter to be Included in the Record on Appeal were originally due on June 7, 2017. At the Appellant's request, the Court granted a 30-day extension of time, until July 7, 2017, to serve and file the Appellant's Initial Brief and Designation of Matter. The Appellant, Marion County Sheriff's Department, respectfully requests the



Court to grant a second extension of 30 days, or until Monday, August 7, 2017, to serve and file its Initial Brief of Appellant and Designation of Matter.

Counsel for the Appellant requests a second extension due to preparing filings in cases pending before the United States District Court for South Carolina and preparing and filing an Initial Respondent's Brief with this Court today. Counsel also rescheduled for June a family vacation planned for July due to a surgical procedure scheduled for her daughter to occur in July.

Counsel for Appellant has contacted Respondent's counsel and he consents to this request as indicated in the attached document.

Accordingly, the Appellant, Marion County Sheriff's Department, respectfully requests an additional 30-day extension of time in which to serve and file its Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal.



Douglas C. Baxter
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(803) 771-4400
**ATTORNEYS FOR APPELLANT
MARION COUNTY SHERIFF'S
DEPARTMENT**

July 6, 2017.

EXHIBIT "A"

Carmen Ganjehsani

From: Eric Poulin <eric@akimlawfirm.com>
Sent: Wednesday, July 05, 2017 1:12 PM
To: Carmen Ganjehsani; ziptrial@googlegroups.com
Cc: roy@akimlawfirm.com
Subject: Re: Blackwell v. Marion County Sheriff's Department

Sure, no problem.

On Wed, Jul 5, 2017 at 1:13 PM, Carmen Ganjehsani <CGanjehsani@richardsonplowden.com> wrote:

This is Carmen Ganjehsani. I am the appellate counsel for Marion County Sheriff's Department in the above-referenced appeal. My brief is due this Friday, July 7, 2017. I was wondering if you would consent to one additional thirty day extension for me to file my brief. We moved up our beach vacation to last week because we found out our daughter has to have a surgical procedure this Friday. I have also been working on another large appeal due tomorrow. In addition, I now work a limited part-time schedule and sometimes need extra time to prepare my briefs.

Thank you in advance for your assistance,

Carmen Ganjehsani

HOME	VCARD	LOCATION
	Carmen V. Ganjehsani Special Counsel Cganjehsani@RichardsonPlowden.com	Richardson Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 www.RichardsonPlowden.com

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Eric M. Poulin, Esq.
Director of Litigation

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CERTIFICATE OF SERVICE

I, the undersigned, attorney for Appellant, Marion County Sheriff's Department, do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated July 6, 2017, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Eric M. Poulin
Roy T. Willey, IV
ANASTOPOULO LAW FIRM, LLC
62 Columbus Street
Charleston, SC 29403
ATTORNEYS FOR RESPONDENT

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MARION COUNTY SHERIFF'S
DEPARTMENT**

Dated: July 6, 2017.

Reply to: **Carmen V. Ganjehsani**
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

July 6, 2017

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: *Blackwell v. Marion County Sheriff's Department*
Appellate Case No. 2017-000210
RPR File No.: 149-211

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Dear Ms. Kitchings:

I am enclosing for filing the original and six copies of the Appellant's Motion for Extension of Time to file the Initial Appellant's Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our Certificate of Service. Also enclosed is our firm's check in the amount of \$25.00 to cover the filing fee for this Motion.

By copy of this letter, we are serving a copy of this Motion on counsel for the Respondent.

If you should have any questions, please do not hesitate to contact me.

Sincerely,



Carmen V. Ganjehsani

Encs.

cc: Eric M. Poulin, Esquire
Roy T. Willey, IV, Esquire
Douglas C. Baxter (FYI)

07/06/2017

US POSTAGE \$002.45⁰



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149-211

RICHARDSON
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The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
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