

84994

**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

RECEIVED
OCT 30 2017
SC Court of Appeals

Vanessa Blackwell, a/k/a
Jacqueline Blackwell,

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 Reply Brief of Appellant, Marion County Sheriff's Department, and Additional Designation of Matter to be Included in the Record on Appeal were originally due on Monday, October 16, 2017. Appellant previously requested an extension until Thursday, October 26, 2017 to file the Initial Reply Brief and Additional Designations. The Appellant respectfully requests the Court to grant a second extension of 10 days, or

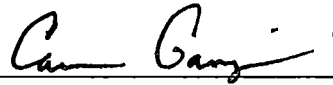


until Monday, November 6, 2017, to serve and file its Initial Reply Brief of Appellant and Additional Designation of Matter.

Counsel for the Appellant requests a second extension due to the preparation and filing of a brief with the United States Court of Appeals for the Fourth Circuit.

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 10-day extension of time in which to serve and file its Initial Reply Brief of Appellant and Additional Designation of Matter to be Included in the Record on Appeal.



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Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
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Columbia, South Carolina 29202
(803) 771-4400
**ATTORNEYS FOR APPELLANT
MARION COUNTY SHERIFF'S
DEPARTMENT**

October 26, 2017.

EXHIBIT “A”

Carmen Ganjehsani


From: Eric Poulin <eric@akimlawfirm.com>
Sent: Wednesday, October 25, 2017 11:12 AM
To: Carmen Ganjehsani
Subject: Re: Blackwell v. Marion County Sheriff's Department

No objection from me

On Wed, Oct 25, 2017 at 10:52 AM Carmen Ganjehsani <CGanjehsani@richardsonplowden.com> wrote:

Do you mind if I obtain one additional extension to file my Reply Brief? I had a Fourth Circuit brief due today and have not had a chance to get to the reply. Thanks,

Carmen

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

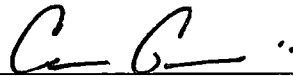
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Sent from iPhone

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 October 26, 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



Carmen V. Ganjehsani
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**ATTORNEYS FOR APPELLANT
MARION COUNTY SHERIFF'S
DEPARTMENT**

Dated: October 26, 2017.

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

October 26, 2017

RECEIVED
OCT 30 2017
SC Court of Appeals

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

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 Reply Brief and Additional 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)

Hasler

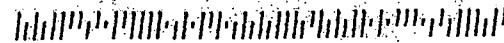
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149-211

RICHARDSON
RICHARDSON PLOWDEN ROBINSON, P.A.
PLOWDEN
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202

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