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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Jocelyn Newman, Circuit Court Judge

Appellate Case No. 2017-001124
Case No. 2012-CP-40-2456

RECEIVED
DEC 04 2017
SC Court of Appeals

Reginald Andre Blanding, Wanda Blanding, and
Brittani Blanding, by and through her Guardian ad Litema,
Reginald Andre Blanding and Wanda Blanding,..... Plaintiffs,

Of whom, Reginald Andre Blanding, Wanda Blanding and
Brittani Blanding are Appellants,

v.

Leon Lott, in his official capacity, Respondent.

**MOTION FOR EXTENSION TO
FILE INITIAL BRIEF OF RESPONDENT**

The Respondent Leon Lott respectfully moves this Court for an additional extension of time until January 5, 2018, by which to file and serve his Initial Brief and Designation of Matter to be Included in the Record on Appeal.



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


1. The Respondent's Initial Brief is currently due to be filed and served on December 6, 2017.

2. The undersigned counsel for the Respondent requires this additional time to prepare the Respondent's Initial Brief because of other obligations and deadlines, including two oral arguments at the Fourth Circuit Court of Appeals in Richmond, Virginia on December 5 and 6, 2017, another appellate brief due in the South Carolina Supreme Court on December 7, 2017, and another brief due in the United States Supreme Court on December 6, 2017.

3. Counsel for the Appellants Reginald Andre Blanding, Wanda Blanding and Brittani Blanding has been consulted and has consented to the requested extension. (See attached email).

WHEREFORE, the Respondent Leon Lott respectfully requests that he be allowed until January 5, 2018, by which to file and serve his Initial Brief and Designation of Matter to be Included in the Record on Appeal.

DAVIDSON & LINDEMANN, P.A.

BY: 

ANDREW F. LINDEMANN
ROBERT D. GARFIELD
1611 Devonshire Drive
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Columbia, South Carolina 29202
(803) 806-8222

Counsel for Respondent Leon Lott

Columbia, South Carolina
December 4, 2017

Andrew Lindemann

From: Robert Butcher <rbutcher@camdensc-law.com>
Sent: Sunday, December 03, 2017 8:31 PM
To: Andrew Lindemann
Subject: Re: Blanding v. Lott

I consent. File it as a joint motion and sign for me if it helps.

Sent from my Illudium Q-36 Explosive Space Modulator

On Dec 3, 2017, at 6:39 PM, Andrew Lindemann <alindemann@DML-LAW.com> wrote:

Robert:

I have a favor to ask. My Initial Respondent's Brief is due Wednesday at the Court of Appeals. I need to request an additional 30 day extension. I am scheduled to leave for Richmond tomorrow and have two arguments at the Fourth Circuit on Tuesday and Wednesday.

Would you kindly consent to the extension? With the extension, the brief will be due on January 5th.

I would like to get the extension request filed on Monday before I leave. Please let me know if I have your consent. I would appreciate the courtesy.

Thanks.

Andrew

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Reginald Andre Blanding and Wanda Blanding, Plaintiffs,

Of whom, Reginald Andre Blanding, Wanda Blanding and
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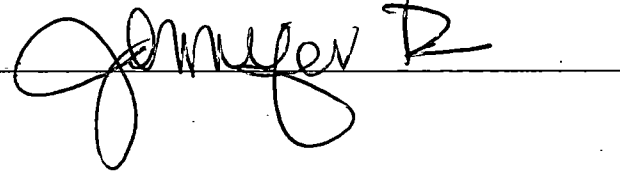
v.

Leon Lott, in his official capacity, Respondent.

CERTIFICATE OF SERVICE

The undersigned employee of Davidson & Lindemann, P.A., counsel for the Respondent, does hereby certify that service of the **Motion for Extension to File Initial Brief of Respondent** in the above-captioned matter was made upon all counsel of record 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 4th day of December 2017:

Deborah J. Butcher, Esquire
Robert J. Butcher, Esquire
Post Office Box 486
Manning, South Carolina 29102

A handwritten signature in black ink, appearing to read "Robert J. Butcher", is written over a horizontal line. The signature is stylized and cursive.

DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

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December 4, 2017

Daniel C. Plyler
Joel S. Hughes
David A. DeMasters
Steven R. Spreuwers
Brandon M. Briggs
Ryan J. Patane

Of Counsel
Kenneth P. Woodington

*Also Admitted In North Carolina
†Certified Mediator

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

RE: Reginald Andre Blanding, Wanda Blanding, and Brittani Blanding v. Leon Lott, in his official capacity
Appellate Case Number: 2017-001124
Civil Action Number: 2012-CP-40-2456
Our File Number: 314.8960

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Motion for Extension to File Initial Brief of Respondent** 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

cc: Deborah J. Butcher, Esquire (w/ Enclosure)
Robert J. Butcher, Esquire (w/ Enclosure)

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