

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APR 09 2018

SC Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

Frank R. Addy, Circuit Court Judge

C.A. No. 2017-CP-30-0008
Appellate Case No. 2017-001831

MOSI A. BUNDU AND MALCOLM DJ WATTS..... Appellants,

v.

RICKY CHASTAIN, COUNTY SHERIFF'S DEPARTMENT,
SOCRATES LEDDA, CITY POLICE CHIEF,
SGT. MICHAEL GAINEY, AND OFFICER LOGAN KANIPE..... Respondents.

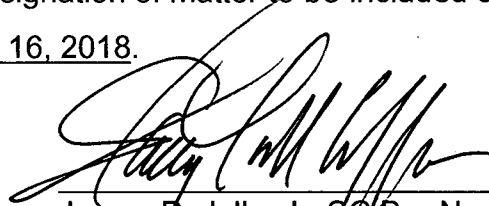
RESPONDENTS' FIRST MOTION FOR 30 DAY EXTENSION
OF DEADLINE TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER

For the reasons stated below, the Respondents, Socrates Ledda, City Police Chief, Sgt. Michael Gainey, and Officer Logan Kanipe, by and through their undersigned counsel, respectfully move the Court for a 30-day extension of the deadline by which it may file its initial brief and designation of matter to be included in the record on appeal in the case.

These Respondents received a letter from the South Carolina Court of Appeals dated March 16, 2018, making the Respondents' initial brief and designation of matter due on Monday, April 16, 2018, since the actual due date of April 15, 2018 is a Sunday.

The Respondents' undersigned counsel now move, in light of continuing activity in other cases in which they are involved as well as personal obligations and planned vacations, for an extension of the deadline by which the Respondents may file their initial brief and designation of matter. Further, the Respondents are in receipt of a letter from the Court dated April 3, 2018 addressed to the *pro se* Appellants which addresses items that require correction or amendment before the Court will consider the Appellants' initial brief. In light of that letter, an extension of time for the Respondents seems necessary in order to receive all corrected or amended documents from the Appellants.

Therefore, the Respondents' undersigned counsel respectfully urges this Court to grant their motion and, accordingly, the Respondents' undersigned counsel respectfully urges this Court to extend the deadline by which the Respondents, Socrates Ledda, Sgt. Michael Gainey, and Officer Logan Kanipe, must file its initial brief and designation of matter to be included on the record of appeal until Wednesday, May 16, 2018.



James D. Jolly, Jr. SC Bar No. 3080
Stacey Todd Coffee SC Bar No. 6525
LOGAN, JOLLY & SMITH, L.L.P.
1805 North Boulevard
Post Office Box 259
Anderson, SC 29622
(864)226-1910
(864)226-1931 (fax)
Attorneys for Respondents Ledda, Gainey,
and Kanipe

Anderson, South Carolina

Date: 4/6/18

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APR 09 2018

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

SC Court of Appeals

Frank R. Addy, Circuit Court Judge

C.A. No. 2017-CP-30-0008
Appellate Case No. 2017-001831

MOSI A. BUNDU AND MALCOLM DJ WATTS,..... Appellants,

v.

RICKY CHASTAIN, COUNTY SHERIFF'S DEPARTMENT,
SOCRATES LEDDA, CITY POLICE CHIEF,
SGT. MICHAEL GAINEY,
AND OFFICER LOGAN KANIPE Respondents.

PROOF OF SERVICE

I certify that I have served the RESPONDENTS' FIRST MOTION FOR 30-DAY EXTENSION OF DEADLINE TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER on the above-named *pro se* Appellants, and counsel for Respondent Chastain by mailing to them, first-class postage pre-paid, at the following addresses:

Mosi A Bundu
206B Mock St.
Laurens, SC 29306

Malcolm DJ Watts
1935 Curry Road
Laurens, SC 29360

Russell W. Harter, Jr.
Chapman, Harter & Harter
14 Lavinia Ave.
Greenville, SC 29601



James D. Jolly, Jr. SC Bar No. 3080
Stacey Todd Coffee SC Bar No. 6525
LOGAN, JOLLY & SMITH, L.L.P.
1805 North Boulevard
Post Office Box 259
Anderson, SC 29622
(864)226-1910
(864)226-1931 (fax)
Attorneys for Respondents Ledda,
Gainey, & Kanipe

Anderson, South Carolina

Date: 4/6/18



Stacey Todd Coffee, Esquire
Email: coffee@loganjollysmith.com

April 6, 2018

RECEIVED
APR 09 2018
SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

1805 North Boulevard
Anderson, SC 29621
Telephone: 864-226-1910
Facsimile: 864-226-1931

Re: Mosi A. Bundu and Malcolm DJ Watts v. Ricky Chastain, County Sheriff's Dept.; Socrates Ledda, City Police Chief, Sgt. Michael Gainey and Officer Logan Kanipe
Case No. 2017-CP-30-0008
Appellate Case No. 2017-001831

Mailing Address
Post Office Box 259
Anderson, SC 29622

Dear Ms. Kitchings:

Please find enclosed for filing and consideration the Respondents' First Motion for 30-Day Extension to File Initial Brief and Designation of Matter, as well as a Certificate of Service in the above referenced matter. Please return a clocked in copy of the same to me in the enclosed self-addressed stamped envelope.

www.loganjollysmith.com

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

With kind regards, I remain,

Yours very truly,

Logan, Jolly & Smith, LLP

Stacey Todd Coffee

STC:hgc

Enclosures

cc: Mosi A. Bundu

Malcolm DJ Watts

Russell Harter, Esq.



Post Office Box 259
Anderson, SC 29622

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

NEOPOST

FIRST-CLASS MAIL

04/06/2018

US POSTAGE

\$000.68⁰⁰



ZIP 29621
041L10400632

RECEIVED
APR 09 2018
SC Court of Appeals

296223749 0075

