

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

Frank R. Addy, Circuit Court Judge

RECEIVED

APR 12 2018

SC Court of Appeals

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

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

v.

RICKY CHASTAIN, AS LAURENS COUNTY SHERIFF,
MICHAEL GAINEY, SOCRATES LEDDA, AS LAURENS CITY POLICE CHIEF,
JOHN DOE(S), LAURENS COUNTY SHERIFF'S DEPARTMENT, LOGAN
KANJIPE, AND LAURENS CITY POLICE DEPARTMENT..... Respondents.

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

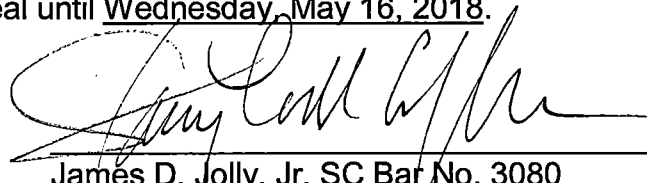
For the reasons stated below, the Respondents, Socrates Ledda, as Laurens City Police Chief, Michael Gainey, Officer Logan Kanipe, and Laurens City Police Department by and through their undersigned counsel, respectfully move the Court for a 30-day extension of the deadline by which it may file its initial 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, Michael Gainey, Logan Kanipe, and Laurens City Police Department 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,
Kanipe, and Laurens City Police Department

Anderson, South Carolina

Date: 4/10/18

RECEIVED

APR 12 2018

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the 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, AS LAURENS COUNTY SHERIFF,
MICHAEL GAINNEY, SOCRATES LEDDA, AS LAURENS CITY POLICE CHIEF,
JOHN DOE(S), LAURENS COUNTY SHERIFF'S DEPARTMENT, LOGAN
KANIPE, AND LAURENS CITY POLICE DEPARTMENT..... Respondents.

PROOF OF SERVICE

I certify that I have served the RESPONDENTS' **AMENDED 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

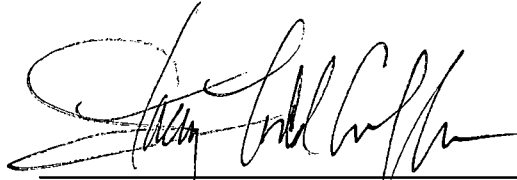
Malcolm DJ Watts
1935 Curry Road
Laurens, SC 29360

RECEIVED

APR 12 2018

SC Court of Appeals

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, & Laurens City Police Dept.

Anderson, South Carolina

Date: 4/10/18

RECEIVED

APR 12 2018

SC Court of Appeals



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

April 10, 2018

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, as
Laurens County Sheriff, Michael Gainey, Socrates D. Ledda, as
Laurens City Police Chief, John Doe(s), Laurens County Sheriffs
Department, Logan Kanipe, and Laurens City Police Department
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' **Amended** 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

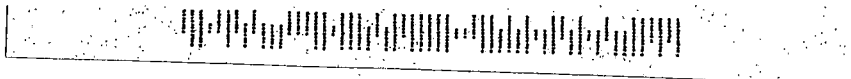
STC:hgc
Enclosures

cc: Mosi A. Bundu
Malcolm DJ Watts
Russell Harter, Esq.

RECEIVED

APR 12 2018

SC Court of Appeals



RECEIVED

APR 12 2018

SC Court of Appeals

NEOPOST

FIRST-CLASS MAIL

04/10/2018

US POSTAGE \$001.10⁰⁰



ZIP 29621
041L10400632



Post Office Box 259
Anderson, SC 29622

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