

APPEAL FROM COMMON PLEAS REGARDING A CONVICTION IN  
MUNICIPAL COURT

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Case No. 2018-1291

The City of Columbia,

Appellant,

v.

Shasha Rawlinson,

Respondent.

MOTION TO STAY THE TIME LIMITS FOR SUBMITTING APPELLANT'S  
INITIAL BRIEF

Appellant City of Columbia ("the City") hereby moves for an Order staying the time limits for Appellant to submit its Initial Brief pursuant to Rule 240(b) of the South Carolina Appellate Court Rules. This motion is made on the following grounds:

1. On June 13, 2018, the circuit court, sitting in its appellate capacity issued an order reversing Respondent Rawlinson's City of Columbia municipal court conviction.
2. On the same day, the City requested the transcript for the hearing that forms the basis of this appeal.
3. On July 11, 2018, the City filed a Notice of Appeal with this Court.
4. The City received the transcript on August 13, 2018, which made its initial brief due on September 12, 2018. Rule 208(1), SCACR.

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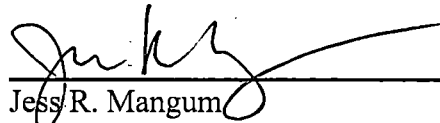
SEP 07 2018

SC Court of Appeals

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5. On August 31, 2018, Rawlinson served the City with her Motion to Dismiss the City's appeal.
6. On September 7, 2018, the City filed its Return to Rawlinson's Motion to Dismiss. *See* Rule 240(e), SCACR (stating a party opposing a motion has ten days from the date of service to file a return).
7. Rawlinson's August 31, 2018 filing stays the time limits for submitting briefs. *See* Rule 240(b), SCACR (stating a motion to dismiss automatically stays the time limits for perfecting an appeal until the court decides the motion).
8. Therefore, the City's Initial Brief is no longer due on September 12, 2018.
9. Based on the Appellate Court Rules and general rules related to civil procedure, the City's Initial Brief will be due twelve (12) days after the Court decides Rawlinson's pending Motion to Dismiss.

For the reasons stated above, Appellant respectfully requests this Court issue an Order granting Appellant's Motion to Stay the Time Limits for Submitting Appellant's Initial Brief.

  
\_\_\_\_\_  
Jess R. Mangum  
SC Bar No.: 10068  
Office of the City Attorney  
Post Office Box 667  
Columbia, South Carolina 29202  
(803) 737-4242  
Attorney for Appellant

Other Counsel of Record:  
Jerry Finney  
The Finney Law Firm, Inc.  
2117 Park Street  
Columbia, South Carolina 29201  
Attorney for Respondent

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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

SEP 07 2018

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Case No. 2017-CP-40-01699  
Appellate Case No: 2018-1291

City of Columbia.....Appellant,

v.

Shasha Rawlinson ..... Respondent.

**PROOF OF SERVICE**

The undersigned hereby certifies that she served a copy of the Appellant’s Return to Respondent’s Motion to Dismiss and Appellant’s Motion to Stay The Time Limits for Submitting Appellant’s Initial Brief upon the Attorney for the Respondent by placing a copy in the United States Mail, sufficient postage pre-paid and return address clearly indicated to him at his address shown below on this 7<sup>th</sup> day of September, 2018:

Jerry L. Finney, Esquire  
2117 Park Street  
Columbia, SC 29201

*Geraldine S. Pleasant*  
Geraldine S. Pleasant, Paralegal for  
Jessica R. Mangum, Attorney for Respondent  
Office of the City Attorney  
Post Office Box 667  
Columbia, South Carolina 29202  
(803)737-4242

September 7, 2018



We Are Columbia

Office of the City Attorney  
Post Office Box 667 • Columbia, SC 29202 • (803) 737-4242 • Fax (803) 737-4250

September 7, 2018

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SC Court of Appeals

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RE: City of Columbia v. Sasha Rawlinson  
Court of Appeals No.: 2018-1291

Dear Ms. Kitchings:

Enclosed for filing please find the original and six copies of the *Appellant's Return to Respondent's Motion to Dismiss* and *Appellant's Motion to Stay The Time Limits of Appellant's Initial Brief*, along with the original *Proof of Service* in the above-referenced matter.

By copy of this letter, I am serving same on the attorney for the Respondent.

Sincerely,

Jessica R. Mangum  
Assistant City Attorney

JRM/gsp  
Enclosures as Stated

cc: Jerry Finney, Esquire