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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Deadra L. Jefferson, Circuit Court Judge

Case No.: 2014-CP-10-4591  
Appellate Case No. 2017-002392

**RECEIVED**  
SEP 24 2018  
SC Court of Appeals

Jane Doe 202, by John Doe MM and John Doe HS, each of whom holds power of attorney for Jane Doe .....Appellant,

v.

City of North Charleston; Leigh Anne McGowan, individually, Charles Francis Wholleb, individually, and Anthony M. Doxey, individually ..... Respondents.

**RESPONDENTS' MOTION TO EXTEND TIME**

Respondents move to extend the deadline to file Respondents' Final Brief by 20 days. According to Appellate Court records, Appellant served the Record on Appeal on Respondents on August 27, 2018, by email and United States mail. However, Respondents have no record of having received a copy of the Record on Appeal through the United States mail. Additionally, using August 27, 2018, as the service date, Respondents' Final Brief would have been due on September 17, 2018. The undersigned would show that due to the mandatory evacuation order issued by Governor McMaster, the undersigned's office was closed from September 11-14 and the evacuation order was heeded. Therefore, additional time is needed to submit Respondents' Final Brief.

Based on the foregoing, Respondents respectfully request a 20 day extension to file Respondents' Final Brief, which would make Respondents' Final Brief due on or before October 8, 2018. The undersigned has consulted with counsel for Appellants, and counsel for Appellants consents to this motion/request for an extension.

**[signature on following page]**

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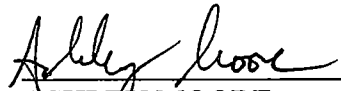
Jane Doe 202, by John Doe MM and John Doe HS, each of whom holds power of attorney for Jane Doe, ..... Appellant,

v.

City of North Charleston; Leigh Anne McGowan, individually, Charles Francis Wohlleb, individually, and Anthony M. Doxey, individually, ..... Respondents.

PROOF OF SERVICE

I certify that I have served the Respondents' Motion to Extend Time to be Included in the Record on Appeal on Jane Doe 202, by depositing a copy of the same in the United States Mail, postage prepaid, on September 21, 2018, addressed to her attorney of record, Gregg Meyers, Post Office Box 22437, Charleston, South Carolina 29413.

  
ASHLEY MOORE  
Paralegal to Chris Dorsal  
*Senn Legal, LLC*  
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-LLC-

ATTORNEYS AT LAW

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[chris@sennlegal.com](mailto:chris@sennlegal.com)

September 20, 2018

Honorable V. Clair Allen  
The South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

RE: Jane Doe, et al v. City of North Charleston, et al  
Appellate Case No. 2017-002392  
File No. GM0023

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SC Court of Appeals

Dear Ms. Allen:

Enclosed please for filing please find the original and a copy of *Respondant's Motion to Extend Time and Proof of Service*. Included with this correspondence is a firm check in the amount of \$25.00, which represents the filing fee attendant to this request. As noted by the Certificate of Mailing, appellants' counsel is being served with a copy of this pleading on today's date.

With kind regards, I am,

Sincerely,

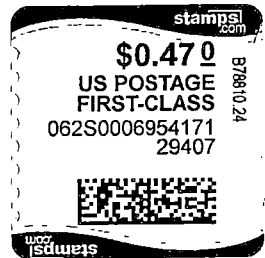
Christopher T. Dorsel

llc  
Enclosure: As listed above

J

Senn Legal  
PO Box 12279  
Charleston, SC 29422

CHARLESTON  
SC 294  
21 SEP 18  
PA 11



Honorable V. Claire Allen  
The South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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