

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Kristi Lea Harrington, Circuit Court Judge

RECEIVED
NOV 13 2018
SC Court of Appeals

Appellate Case No. 2018-000791
Case No. 2016-CP-08-0131

Jeffrey Lance Cruce,..... Respondent,

v.

Berkeley County School District,..... Appellant.

**MOTION FOR EXTENSION OF TIME
TO FILE INITIAL REPLY BRIEF**

The Appellant Berkeley County School District respectfully moves this Court for an additional two-day extension of time until November 15, 2018, by which to file and serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

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

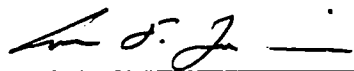
1. The Appellant's Initial Reply Brief is currently due to be filed and served on November 13, 2018.

2. The undersigned counsel for the Appellant requires this additional time to complete the preparation of the Initial Reply Brief because of other obligations and deadlines, including an additional appellate brief due on the same date as well as a Federal Court motion due on the same date. Additionally, the undersigned counsel was unexpectedly delayed because of his involvement in a lengthy municipal council meeting occurring on the evening of November 12, 2018.

3. Counsel for the Respondent has been consulted and has kindly consented to the requested two-day extension. (See attached email).

WHEREFORE, the Appellant respectfully requests that it be allowed until November 15, 2018, by which to file and serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN, DAVIS & HUGHES P.A.

BY: 
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*Counsel for Appellant
Berkeley County School District*

November 13, 2018

Andrew Lindemann

From: Nancy Bloodgood <nbloodgood@bloodgoodsanders.com>
Sent: Tuesday, November 13, 2018 1:54 PM
To: Andrew Lindemann
Subject: RE: Cruce v. Berkeley County School District

That's fine with me Andrew

Nancy Bloodgood, Partner
Bloodgood & Sanders, LLC
242 Mathis Ferry Road, Suite 201
Mt. Pleasant, SC 29464
office: 843-972-0313
nbloodgood@bloodgoodsanders.com

From: Andrew Lindemann [<mailto:Andrew@LDH-Law.com>]
Sent: Tuesday, November 13, 2018 1:51 PM
To: Nancy Bloodgood
Subject: Cruce v. Berkeley County School District
Importance: High

Nancy:

I have a huge favor to ask. My reply brief is due today in this case. I also have another brief due to the Court of Appeals as well. I am running a little behind schedule. Would you kindly consent to an additional extension of two days (through this Thursday) for me to file the Initial Reply Brief in this case. It would be most appreciated.

Thanks.

Andrew

CERTIFICATE OF SERVICE

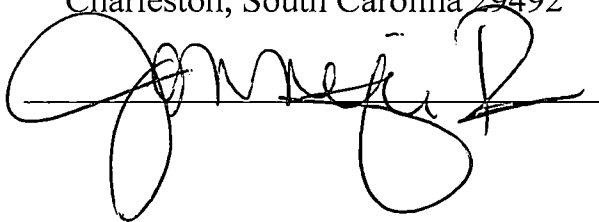
The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Appellant Berkeley School District, does hereby certify that service of the **Motion for Extension of Time to File Initial Reply Brief** was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 13th day of November 2018:

Nancy Bloodgood, Esquire
Bloodgood & Sanders, LLC
242 Mathis Ferry Road Suite 201
Mt. Pleasant, South Carolina 29464

Richard J. Morgan, Esquire
Wm. Grayson Lambert, Esquire
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Email: joel@ldh-law.com

*Also Admitted in North Carolina
†Certified Mediator

November 13, 2018

Hand Delivered

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

RECEIVED
NOV 13 2018
SC Court of Appeals

RE: Jeffrey Lance Cruce v. Berkeley County School District
Appellate Case Number: 2018-000791
Civil Action Number: 2016-CP-08-0131
Claim Number: 17177
Our File Number: 104.20017

Dear Ms. Kitchings:

Please find enclosed the original and seven copies of the **Motion for Extension of Time to File Initial Reply Brief** in the above referenced matter. I would appreciate you filing the original and returning a clocked-in copy to me by way of my paralegal. I have also enclosed my firm's \$50.00 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,

LINDEMANN, DAVIS & HUGHES, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosures

The Honorable Jenny Abbott Kitchings
November 13, 2018
Page Two

cc: (w/ Enclosure)

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