

88 469

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

RECEIVED

DEC 06 2018

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

The Honorable G. Thomas Cooper, Circuit Court Judge

The Honorable Jocelyn Newman

Court of Appeals Case No. 2018-000948

Case No. 2015-CP-40-5598

Modesta Brinkman, David Brinkman, James Coleman,
Carl Foster, Karen Foster, and Robert Collins.....Appellants,

v.


City of Columbia, South Carolina, North American
Pipeline Management and Layne Inliner..... Respondents.

**MOTION FOR ENLARGEMENT OF TIME
TO FILE AND SERVE REPLY BRIEF**

Layne Inliner has been listed on Appellants' appellate filings as a Respondent in this matter. However, upon information and belief, no Order as to Layne Inliner has been appealed. To the extent an initial brief or similar filing is required or may be useful to the Court, however, and to the extent a motion to enlarge the time for filing is required as to such a filing, Layne Inliner herewith moves for an enlargement of time until December 6, 2018, for the submission of its filing. A check for the filing fee accompanies this motion.

December 5, 2018

Respectfully,



Everett A. Kendall II
Brandon R. Gottschall
Sweeny Wingate & Barrow, P.A.
Columbia, South Carolina 29211
(803)256-2233
Attorneys for Layne Inliner

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

RECEIVED

DEC 06 2018

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

The Honorable G. Thomas Cooper, Circuit Court Judge

The Honorable Jocelyn Newman

Court of Appeals Case No. 2018-000948

Case No. 2015-CP-40-5598

Modesta Brinkman, David Brinkman, James Coleman,
Carl Foster, Karen Foster, and Robert Collins.....Appellants,

v.

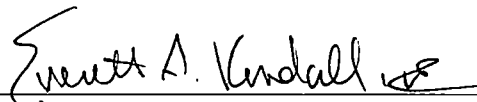
City of Columbia, South Carolina, North American
Pipeline Management and Layne Inliner..... Respondents.

**BRIEF JOINING INITIAL BRIEFS OF CITY OF COLUMBIA, SOUTH CAROLINA
AND NORTH AMERICAN PIPELINE MANAGEMENT**

Layne Inliner has been listed on Appellants' appellate filings as a Respondent in this matter. However, upon information and belief, no Order as to Layne Inliner has been appealed. To the extent an initial brief or similar filing is required or may be useful to the Court, however, Layne Inliner joins the initial briefs filed by Respondents City of Columbia, South Carolina and North American Pipeline Management.

December 5, 2018

Respectfully,



Everett A. Kendall II
Brandon R. Gottschall
Sweeny Wingate & Barrow, P.A.
Columbia, South Carolina 29211
(803)256-2233
Attorneys for Layne Inliner

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

RECEIVED

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

DEC 06 2018

The Honorable G. Thomas Cooper, Circuit Court Judge
The Honorable Jocelyn Newman

SC Court of Appeals

Court of Appeals Case No. 2018-000948
Case No. 2015-CP-40-5598

Modesta Brinkman, David Brinkman, James Coleman,
Carl Foster, Karen Foster, and Robert Collins.....Appellants,

v.

City of Columbia, South Carolina, North American
Pipeline Management and Layne Inliner..... Respondents.

**PROOF OF SERVICE OF LAYNE INLINER’S BRIEF AND MOTION FOR
ENLARGMENT OF TIME**

I certify that I have served Layne Inliner’s Brief Joining Initial Briefs of City of Columbia, South Carolina and North American Pipeline Management, and Layne Inliner’s Motion for Enlargement of Time by depositing copies in the United States Mail, postage prepaid, on December 5, 2018, addressed to Appellants’ and Respondents’ attorneys of record as identified below and at the addresses identified below:

Geoffrey K. Chambers, Esquire
CPERL Group
411 Walnut Street, #10646
Green Cove Springs, FL 32043-3443
Attorney for Plaintiff

John Adams Hodge, Esquire
John Adams Hodge & Associates, LLC
Post Office Box 25553
Columbia, SC 29224
Attorney for Plaintiff

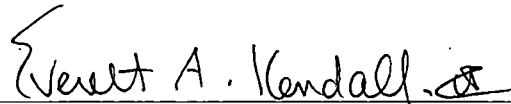
W. Michael Hemlepp, Jr., Esquire
City of Columbia
1401 Main Street, 10th Floor
Post Office Box 667
Columbia, SC 29202
Attorney for Defendant City of Columbia

Heath M. Stewart, III, Esquire
McAngus Goudelock & Courie, LLC (Columbia)
1320 Main Street, 10th Floor
Post Office Box 12519
Columbia, SC 29211
Attorney for Defendant North American Pipeline Management, Inc.

Robert T. Boineau, III, Esquire
McAngus Goudelock & Courie, LLC (Columbia)
1320 Main Street, 10th Floor
Post Office Box 12519
Columbia, SC 29211
Attorney for Defendant North American Pipeline Management, Inc.

December 5, 2018

Respectfully,



Everett A. Kendall II
Brandon R. Gottschall
Sweeny Wingate & Barrow, P.A.
Columbia, South Carolina 29211
(803)256-2233
Attorneys for Layne Inliner

S·W·B

SWEENEY WINGATE & BARROW P.A.

RECEIVED

DEC 06 2018

December 6, 2018

SC Court of Appeals

Reply to: Main Office
Brandon R. Gottschall
(803) 256-2233 x7132
brg@swblaw.com

VIA HAND DELIVERY

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

RE: Modesta Brinkman, et al v. Layne Inliner, et al
Civil Action No.: 2015CP4005598 - Appellate Case No. 2018-000948
Our File: 1411-10328

Dear Ms. Kitchings:

Enclosed for filing, please find the originals and one (1) copy each of Respondent Layne Inliner's Motion for Enlargement of Time to File and Serve Reply Brief, Brief Joining Initial Briefs of City of Columbia, South Carolina and North American Pipeline Management and Proof of Service in the above-referenced matter. Please return a clocked copy of each to me via our courier. Also enclosed is the \$50 filing fee.

Thank you for your assistance and should you have any questions or concerns, please do not hesitate to contact me.

Yours truly,

SWEENEY, WINGATE & BARROW, P.A.



Brandon R. Gottschall

BRG/smt
Enclosures

cc: Heath M. Stewart, III, Esquire, McAngus Goudelock & Courie, LLC (Columbia)
W. Michael Hemlepp, Jr., Esquire, City of Columbia
Geoffrey K. Chambers, Esquire, CPERL Group
Robert T. Boineau, III, Esquire, McAngus Goudelock & Courie, LLC (Columbia)
John Adams Hodge, Esquire, John Adams Hodge & Associates, LLC