

88866

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

Appellate Case No: 2018-001262

RECEIVED
JAN 24 2019
SC Court of Appeals

Dorchester County Taxpayers Association,
individually and on behalf of all others
similarly situated, Weatherstone Property
Owners Association, individually and on
behalf of all others similarly situated,
George Resnick, William A. Harbeson,
James Stephen Greene, Jr., Homer P.
Gonzalez, Gerald E. Ziegler and South
Carolina Public Interest Foundation,

Appellants,

v.

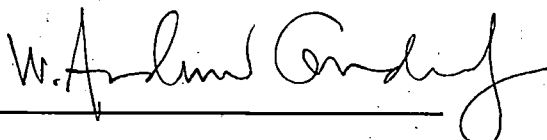
Dorchester County, Dorchester County Council,
David Chinnis, George Bailey, Jay Byars,
Willie Davis, Carroll S. Duncan, Larry Hargett
and William R. Hearn, Jr., in their official
capacities as members of Dorchester County
Council, Town of Summerville, Summerville Town
Council, William E. McIntosh, III, in his official
capacity, Dorchester County Sheriff, Luther C.
Knight, in his official capacity, Dorchester
School District Two, Dorchester School District
Two Board of Trustees, Joseph R. Pye, Justin
Farnsworth, Gail Hughes, Brian Mitchum, Tanya
Robinson, Sam Clark, Barbara Crosby and Lisa Tupper,
in the official capacities, Dorchester School District
Four, Dorchester School District Four Board of
Trustees, Dorchester County Career and Technology
Center, and Dorchester County Career and
Technology Center Board of Trustees,

Respondents.

MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL REPLY BRIEF

Appellants, by and through their undersigned attorneys, respectfully request an extension of ten days from their original deadline of January 22, 2019 to submit the Appellant's Initial Reply Brief. The motion is filed for good cause, to allow Appellants' counsel sufficient time to adequately prepare the reply brief to the three Respondents' briefs in the context of other professional deadlines and demands on counsel's time. Undersigned Appellants' counsel have consulted with all Respondents' counsel and Respondents' counsel have graciously consented to the relief requested in the motion.

Respectfully submitted,



W. Andrew Gowder (SC Bar No. 7895)
andy@austengowder.com
Austen and Gowder, LLC
1629 Meeting Street, Suite A
Charleston, South Carolina 29405
Phone: 843-727-2229

Mike Rose (SC Bar No. 4910)
mike@mikeroselawfirm.com
Mike Rose Law Firm, PC
409 Central Avenue
Summerville, SC 29483
Phone: 843-871-1821
Counsel for Appellants

January 22, 2019
Charleston, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

Appellate Case No: 2018-001262

Dorchester County Taxpayers
Association, individually and
on behalf of all others
similarly situated,
Weatherstone Property
Owners Association,
individually and on behalf of
all others similarly situated,
George Resnick, William A.
Harbeson, James Stephen
Greene, Jr., Homer P.
Gonzalez, Gerald E. Ziegler
and South Carolina Public
Interest Foundation,

Appellants,

RECEIVED
JAN 24 2019
SC Court of Appeals

v.

Dorchester County,
Dorchester County Council,
David Chinnis, George Bailey,
Jay Byars, Willie Davis,
Carroll S. Duncan, Larry
Hargett and William R. Hearn,
Jr., in their official capacities
as members of Dorchester
County Council, Town of
Summerville, Summerville
Town Council, William E.
McIntosh, III, in his official
capacity, Dorchester County
Sheriff, Luther C. Knight, in
his official capacity,
Dorchester School District
Two, Dorchester School
District Two Board of

Respondents.

Trustees, Joseph R. Pye, Justin Farnsworth, Gail Hughes, Brian Mitchum, Tanya Robinson, Sam Clark, Barbara Crosby and Lisa Tupper, in the official capacities, Dorchester School District Four, Dorchester School District Four Board of Trustees, Dorchester County Career and Technology Center, and Dorchester County Career and Technology Center Board of Trustees,

AFFIDAVIT OF SERVICE

I, W. Andrew Gowder, Jr., being sworn, certify that I have served the Motion For Extension of Time to File Appellant's Initial Reply Brief in the above referenced case by depositing a copy of it in the United States Mail, postage prepaid, on January 22, 2019, addressed to their attorneys of record listed below.



W. Andrew Gowder, Jr. (S.C. Bar No. 7895)
Austen & Gowder, LLC
1629 Meeting Street, Suite A
Charleston, South Carolina, 29464
(843) 727-2229

Michael T. Rose (S.C. Bar No. 4910)
Mike Rose Law Firm
406 Central Ave.
Summerville, SC 29483
(843) 871-1821
Attorneys for Appellants

January 22, 2019

Drew Hamilton Butler
Anthony E. Rebollo
Richardson, Plowden, Carpenter & Robinson, PA
P.O. Box 7788
Columbia, SC 29202
(803) 576-3706

Attorneys for Respondents Dorchester County, Dorchester County Council and Dorchester County Sheriff

David L. Morrison
Morrison Law Firm, LLC
7453 Irmo Drive, Suite B
Columbia, SC 29212
(803) 661-6285

Attorney for Respondents Dorchester County Career and Technology Center and its Board of Trustees

Erik P. Doerring
McNair Law Firm, PA
P.O. Box 11390
Columbia, SC 29211
(803) 799-9800

William H. Davidson, II
Davidson & Lindemann, PA
P.O. Box 8568
Columbia, SC 29202-8568
(803) 806-8222

Attorneys for Respondents Town of Summerville and Summerville Town Council and William E. McIntosh, III

Thomas K. Barlow
Halligan, Mahoney & Williams
P.O. Box 11367
Columbia, SC 29211-1367
(803) 254-4035

Attorney for Respondents Dorchester School District Two, Dorchester School District Two Board of Trustees and individual Trustees

Kenneth A. Davis
Christopher S. Elliott
Adam Jordan Mandell
Boykin & Davis, LLC
P.O. Box 11844
Columbia, SC 29211
(803) 254-0707

Attorneys for Respondents Dorchester County School District Four and its Board of Trustees



Email: rachel@austengowder.com
Direct: (843) 727 2215
Fax: (843) 800-8533

January 22, 2019

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

RECEIVED

JAN 24 2019

SC Court of Appeals

Re: Dorchester County Taxpayers Association, et al. v. Dorchester County, et al.
Appellate Case No.: 2018-001262

Dear Ms. Kitchings:

Enclosed please find for filing the Motion for Extension of Time to File Appellant's Initial Reply Brief with seven copies, a check for \$50 for the filing fee, and an Affidavit of Service from myself. I have also included a pre-paid, pre-addressed, return envelope and an extra copy to be returned to me after being stamped. I appreciate your assistance with this request.

Please call me if you have any questions or concerns.

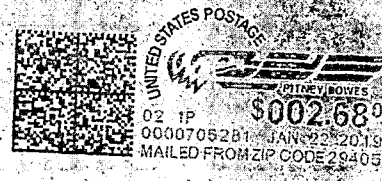
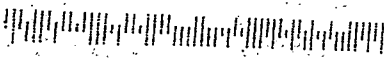
Best regards,

AUSTEN & GOWDER, LLC

A handwritten signature in black ink, appearing to read 'W. Andrew Gowder, Jr.', with a long horizontal flourish extending to the right.

W. Andrew Gowder, Jr.





Austen & Gowder, LLC
1629 Meeting Street, Suite A
Charleston, SC 29405

RECEIVED
JAN 24 2019
SC Court of Appeals

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