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**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County

Court of Common Pleas

Edward W. Miller, Circuit Court Judge

RECEIVED
MAR 13 2019
SC Court of Appeals

Circuit Court Case No. 2016-CP-10-04062

Donald Stanley and Sean Reiter,
Individually and as Class Representatives,

Respondents,

v.

Southern States Police Benevolent Association, Appellant.
Inc.

**MOTION OF RESPONDENTS FOR EXTENSION OF TIME TO
FILE/SERVE RESPONSE TO APPELLANT SOUTHERN STATES
POLICE BENEVOLENT ASSOCIATION, INC.'S
PETITION FOR REHEARING**

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& EARLY, LLC
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*Attorneys for Respondents Donald Stanley
and Sean Reiter, Individually and as Class
Representatives*

NOW COMES Respondents Donald Stanley and Sean Reiter, Individually and as Class Representatives (“Respondents”), by and through his undersigned counsel, on the grounds stated below, and, pursuant to Rule 263(b), SCACR, hereby moves for an extension of ten (10) days’ time to file/serve a response to Appellant Southern States Police Benevolent Association’s petition to this Court for rehearing to review its decision in this matter.

1. The Court dismissed this appeal by Order dated February 14, 2019. Respondent filed a Petition for Rehearing of the dismissal on March 1, 2019. Respondent Amended its Memorandum in Support of the Petition on March 4, 2019. Thus, Appellants’ Return to the Petition is due March 14, 2019, pursuant to Rule 242(c), SCACR.

2. Counsel for the Respondents did not receive a copy of the original Petition for Rehearing until March 7, 2019 and did not receive a copy of the Amended Memorandum until March 8, 2019.

2. Pursuant to the South Carolina Appeals Court Rules, the response to the petition for rehearing is due March 14, 2019 at the latest, therefore the undersigned asks for the Court's allowance of ten (10) additional days, i.e., ten (10) days beyond the present March 14, 2019, deadline, to prepare Donald Stanley and Sean Reiter, individually and as Class Representatives' response to the petition for rehearing, submitting, most respectfully, that there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court.

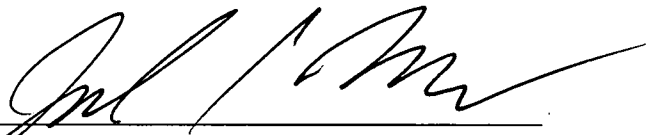
WHEREFORE, Donald Stanley and Sean Reiter, individually and as class representatives, respectfully requests that this Honorable Court allow him an additional ten (10) days to file/serve his response to petition for rehearing in this matter, i.e., to extend the deadline for such response through next Thursday, March 25, 2018.¹ Additionally, Donald Stanley and Sean Reiter, individually and as class representatives, respectfully requests that the Court hold the present deadline in abeyance until it acts upon this motion.

¹ March 24, 2019 is a Sunday.

Respectfully submitted,

PIERCE, HERNS, SLOAN & WILSON,
LLC

By:



Joseph C. Wilson, IV (SC Bar No. 63002)

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Attorneys for Respondents

Donald Stanley and Sean Reiter,

Individually and as Class Representatives

Charleston, South Carolina

March 11, 2019

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PROOF OF SERVICE

PIERCE, SLOAN, WILSON, KENNEDY, &
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*ATTORNEYS FOR RESPONDENTS
DONALD STANLEY AND SEAN REITER,
INDIVIDUALLY AND AS CLASS
REPRESENTATIVES*

I, Joseph C. Wilson, IV, of Pierce, Sloan, Wilson, Kennedy & Early, LLC, counsel for Respondents Donald Stanley and Sean Reiter, Individually and as Class Representatives, hereby certify that the foregoing **MOTION OF RESPONDENTS FOR EXTENSION OF TIME TO FILE/SERVE RESPONSE TO APPELLANT SOUTHERN STATES POLICE BENEVOLENT ASSOCIATION, INC.'S PETITION FOR REHEARING** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on March 11, 2019, properly posted for delivery to the following addressees:

James Edward Bradley, Esq.
Moore Taylor Law Firm, P.A.
PO Box 5709
West Columbia, SC 29171

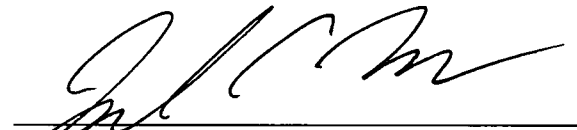
and

Kent T. Stair, Esq.
J. Patrick Norris, Esq.
J. Andrew Yoho, Esq.
Carlock, Copeland and Stair, LLP
40 Calhoun St., Ste. 400
Charleston, SC 29401
Attorneys for Appellant

*South States Police Benevolent Association,
Inc.*

Respectfully submitted,
PIERCE, SLOAN, WILSON,
KENNEDY & EARLY, LLC

By:



Joseph C. Wilson, IV (SC BAR NO.
63002)

*Attorney for Respondents Donald
Stanley and Sean Reiter, Individually
and as Class Representatives*

Charleston, South Carolina

Dated: March 11, 2019

PIERCE | SLOAN
WILSON KENNEDY & EARLY LLC

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ALLAN P. SLOAN, III *◇
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JAMES G. KENNEDY
WILLIAM P. EARLY ◊
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■ MEMBER SC & VA BAR

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◇ CERTIFIED SC CIRCUIT
COURT MEDIATOR
† MEMBER SC, FL & GA BAR
❖ SPECIAL COUNSEL
◊ MEMBER SC & TN BAR

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March 11, 2019

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MAR 13 2019
SC Court of Appeals

~~VIA HAND DELIVERY~~

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

Re: *Donald Stanley, Individually and as Class Representative v. Southern States
Police Benevolent Association, Inc.*
Circuit Court C/A No. 2016-CP-10-4062
PSWKE File No.: P2765.00

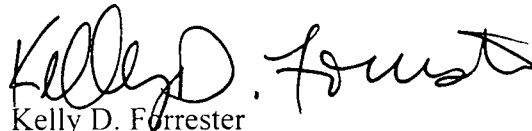
Dear Ms. Kitchings:

Enclosed for filing, please find the original and seven (7) copies of the Motion of Respondents for Extension of Time to File/Serve Response to Appellants' Petition for Rehearing in the above referenced matter. Please file the original with the Court and return a clocked-in copy to our office via the enclosed envelope. Should you have any questions or concerns, please do not hesitate to contact our office.

Please feel free to contact me with any questions or concerns you may have.

With kind regards,

Sincerely,


Kelly D. Forrester

Paralegal to Joseph C. Wilson, IV

Enclosures

cc: Kent T. Stair, Esquire (Via Email and U.S. Mail)
James E. Bradley, Esquire (Via Email and U.S. Mail)
Ronald L. Richter, Jr., Esquire (Via Email)

Eric S. Bland, Esquire (Via Email)
Andrew J. Savage, Esquire (Via Email)