

89422

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 29 2019
SC Court of Appeals

Appellate Case No. 2019-000182

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

v.

Southern States Police Benevolent Association, Inc., Appellant.

APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

NOW COMES Appellant Southern States Police Benevolent Association, Inc. (Appellant) by and through its undersigned counsel, and respectfully moves the Court, pursuant to Rule 224, SCACR, for a five day extension of time to file and serve its Reply Brief in response to Respondents’ Memorandum in Opposition to Appellant’s Petition for Rehearing. Appellant’s Reply Brief is currently due on April 1, 2019. Appellant respectfully requests this deadline be extended to Monday April 8, 2019.¹ In support thereof, Appellant shows the Court the following:

1. Appellant’s time for filing and serving its Reply has not expired.

¹ Appellant notes that 5 days from April 1, 2019 falls on Saturday, April 6, 2019. Appellant respectfully requests the deadline fall on the following business day, April 8, 2019.

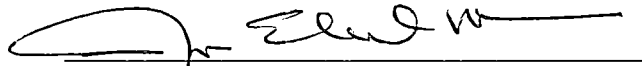
2. Counsel for Appellant needs additional time in order to prepare its Reply due to conflicts in the schedule of counsel.

3. A five day extension of time for Appellant to file its Reply will serve the interest of justice by allowing counsel adequate time to prepare a thorough and detailed brief in this case.

4. Appellant does not request this extension for the impermissible purpose of delay.

WHEREFORE, Appellant The South States Police Benevolent Association respectfully moves the Court for a five day extension of time to April 8, 2019, to file and serve Appellant's Reply to Respondents' Memorandum in Opposition to Appellant's Petition for Rehearing.

Respectfully submitted,



James Edward Bradley, SC Bar #66130
Moore Taylor Law Firm, P.A.
P.O. Box 5709
West Columbia, SC 29171
(803) 796-9160
ward@mttlaw.com

March 29, 2019

Kent T. Stair, Esquire
J. Patrick Norris, Esquire
J. Andrew Yoho, Esquire
Carlock, Copeland & Stair, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401
(843) 266-8224

Attorneys for Appellant Southern States
Police Benevolent Association, Inc.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Case No. 2016-CP-10-04062

RECEIVED
MAR 29 2019
SC Court of Appeals

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

v.

Southern States Police Benevolent Association, Inc., Appellant.

PROOF OF SERVICE

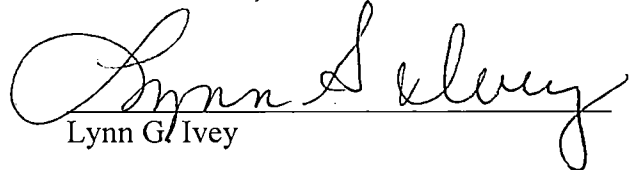
I, Lynn G. Ivey, an employee of the Moore Taylor Law Firm, P.A., certify that I have served the **Appellant's Motion for Extension of Time to File Reply Brief** by depositing copies of same in the United State Mail, postage prepaid, March 29, 2019, addressed to the attorneys of record as follows:

Ronald L. Richter, Jr., Esquire
Scott M. Mongillo, Esquire
Peoples Building
18 Broad Street, Mezzanine
Charleston, SC 29401

Eric S. Bland, Esquire
P.O. Box 72
Columbia, SC 29202

Andrew J. Savage, III, Esquire
15 Prioleau Street
Charleston, SC 29401

Carl E. Pierce, II, Esquire
Joseph C. Wilson, IV, Esquire
Daniel Francis Lynch, IV, Esquire
P.O. Box 22437
Charleston, SC 29413


Lynn G. Ivey

West Columbia, South Carolina
March 29, 2019

March 29, 2019

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

VIA HAND DELIVERY

Re: Donald Stanley and Sean Reiter, Individually and as Class Representatives
vs. Southern States Police Benevolent Association, Inc.
C/A No. 2016-CP-10-04062
Appellate Case No. 2019-000182

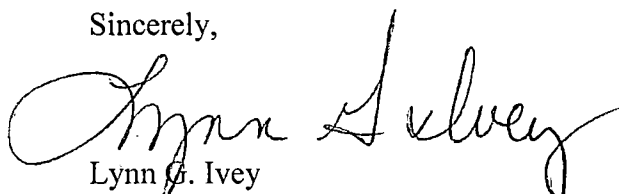
Dear Ms. Kitchings:

Enclosed for filing is the original and five copies of Appellant's Motion for Extension of Time to File Reply Brief and our firm check for \$50.

Please have the extra copies clocked in and returned to our courier.

Thank you for your consideration.

Sincerely,


Lynn G. Ivey
Assistant to James Edward Bradley

Enclosures

cc: Ronald L. Richter, Jr., Esquire (via first class mail)
Scott M. Mongillo, Esquire (via first class mail)
Eric S. Bland, Esquire (via first class mail)
Andrew J. Savage, III, Esquire (via first class mail)
Carl E. Pierce, II, Esquire (via first class mail)
Joseph C. Wilson, IV, Esquire (via first class mail)
Daniel Francis Lynch, IV, Esquire (via first class mail)

RECEIVED
MAR 29 2019
SC Court of Appeals

S. Jahue Moore†
J. Mark Taylor*
C. Vance Stricklin, Jr.
James Edward Bradley†
Sheila McNair Robinson
Christian G. Spradley
C. David Sawyer, Jr.
William H. Edwards
Stanley L. Myers
Jane H. Downey*
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Justin Thomas Williams

Robert D. Hazel
RETIRED
Billy C. Coleman
RETIRED