

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Honorable Circuit Court Judge J. C. Nicholson, Jr.

Case No. 2019-000332

RECEIVED
APR 08 2019
SC Court of Appeals

Alvar R. Rissanen, Michael H. Baxley,
Clifford W. Forner, and Willie L. Hood,

Respondents,

v.

City of North Charleston,

Appellant.

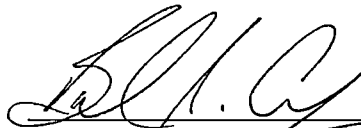
**MOTION FOR FIRST EXTENSION TO FILE APPELLANT'S INITIAL BRIEF AND
DESIGNATION OF MATTER**

The Appellant, City of North Charleston, through its undersigned counsel, hereby requests of this Honorable Court an extension of time in which to file Appellant's Initial Brief and Designation of Matter in the above-referenced matter. The undersigned's office received the following Transcripts of the Record: 1) Phyllis A. Norton, Circuit Court Reporter, on March 3, 2019; 2) Ruth Reese, Circuit Court Reporter, on March 14, 2019; and, 3) Joyce Rueger, Circuit Court Reporter, on March 16, 2019. Pursuant to Rules 208 and 209, SCACR, Appellant's Initial Brief and Designation of Matter are due Monday, April 15, 2019. Obligations of Appellant's counsel necessitate an extension of time in order for the undersigned firm to prepare Appellant's Initial Brief and Designation of Matter. The undersigned certifies that he spoke with Respondents'

counsel who consents to this Motion.

For the reasons discussed, the undersigned respectfully requests a thirty (30) day extension, until Wednesday, May 15, 2019, in which to prepare Appellant's Initial Brief and Designation of Matter.

Respectfully submitted,



Caroline Cleveland
Bob J. Conley
Emmanuel J. Ferguson
CLEVELAND & CONLEY, LLC
171 Church Street, Suite 310
Charleston, SC 29401
Telephone: (843)577-9626
Facsimile: (843)577-6672
ccleveland@clevelandlaborlaw.com
bconley@clevelandlaborlaw.com
eferguson@clevelandlaborlaw.com

Attorneys for Appellant

Charleston, South Carolina

Date: 3/27/19

Other Counsel of Record:

Nancy Bloodgood
Lucy Sanders
BLOODGOOD & SANDERS, LLC
242 Mathis Ferry Road, Suite 201
Mt. Pleasant, SC 29464
T: (843) 972-0313
nbloodgood@bloodgoodsanders.com
lsanders@bloodgoodsanders.com

Attorney for Respondent

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Honorable Circuit Court Judge J. C. Nicholson, Jr.

Case No. 2019-000332

RECEIVED
APR 08 2019
SC Court of Appeals

Alvar R. Rissanen, Michael H. Baxley,
Clifford W. Forner, and Willie L. Hood,

Respondents,

v.

City of North Charleston,

Appellant.

**PROOF OF SERVICE OF MOTION FOR FIRST EXTENSION TO FILE
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER**

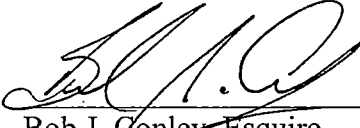
Caroline Cleveland
Bob J. Conley
Emmanuel J. Ferguson
CLEVELAND & CONLEY, LLC
171 Church Street, Suite 310
Charleston, SC 29401
Telephone: (843)577-9626
Email: ccleveland@clevelandlaborlaw.com
bconley@clevelandlaborlaw.com
eferguson@clevelandlaborlaw.com

Attorneys for Appellant

I hereby certify that on March 27, 2019, I served a copy of Appellant's Motion for First Extension to File Appellant's Initial Brief and Designation of Matter on the following:

Nancy Bloodgood
Lucy Sanders
BLOODGOOD & SANDERS, LLC
242 Mathis Ferry Road, Suite 201
Mt. Pleasant, SC 29464

by placing a copy of said document in the United States mail with sufficient postage thereon.


Bob J. Conley, Esquire

Charleston, South Carolina

Date: March 27, 2019

CLEVELAND & CONLEY, L.L.C.
LABOR AND EMPLOYMENT DEFENSE

ONE SEVENTY ONE CHURCH STREET, SUITE 310
CHARLESTON, SOUTH CAROLINA 29401
WWW.CLEVELANDANDCONLEY.COM

CAROLINE WRENN CLEVELAND †
BOB J. CONLEY
EMMANUEL J. FERGUSON

*CERTIFIED SPECIALIST,
LABOR & EMPLOYMENT LAW

TELEPHONE: (843) 577-9626
FAX: (843) 577-6672

March 27, 2019

RECEIVED
APR 08 2019
SC Court of Appeals

The Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

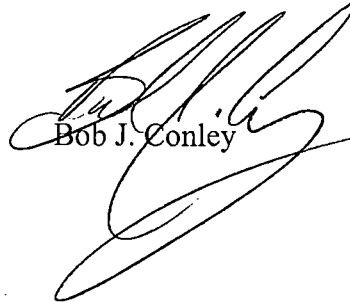
Re: *Alvar R. Rissanen et al. v. City of North Charleston*
Appellate Case No.: 2019-000332

Dear Ms. Kitchings:

Enclosed for filing is the original and six copies of Appellant's Motion for First Extension to File Appellant's Initial Brief and Designation of Matter. Additionally, enclosed is the original Proof of Service of Appellant's Motion for First Extension to File Appellant's Initial Brief and Designation of Matter. Finally, enclosed is the \$25.00 filing fee.

Yours truly,

CLEVELAND & CONLEY, LLC


Bob J. Conley

BJC/lmp
Enclosures: as stated
cc: Nancy Bloodgood, Esquire



\$1.45
US POSTAGE
03/27/2019
From 29401
0 lbs 4 ozs



Pitney Bowes

022W0001125328

9051687695

USPS FIRST-CLASS™ MAIL

Cleveland & Corley, LLC
171 Church St, Ste 310
Charleston SC 29401-3140

B012

THE HONORABLE JENNY KITCHINGS
CLERK, SOUTH CAROLINA COURT OF APPEALS
PO BOX 11629
COLUMBIA SC 29211-1629

RECEIVED

APR 08 2019

SC Court of App