

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

MAY 30 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 INITIAL 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 thirty day extension of time to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal are currently due on June 21, 2019. Appellant respectfully requests that this deadline be extended to Monday July 22, 2019.¹ In support thereof, Appellant shows the Court the following:

1. Appellant's time for filing and serving its Initial Brief and Designation of Matter to be Included in the Record on Appeal has not expired.

¹ Appellant notes that thirty days from March 8, 2019 falls on Sunday, July 21, 2019. Appellant respectfully requests the deadline fall on the following business day, July 22, 2019.

2. Counsel for Appellant needs additional time in order to prepare its Initial Brief and Designation of Matter to be Included in the Record on Appeal due to conflicts in the schedules of counsel.

3. A thirty day extension of time for Appellant to file its Initial Brief and Designation of Matter to be included in the Record on Appeal 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 thirty day extension of time to July 22, 2019, to file and serve Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

CARLOCK, COPELAND & STAIR, LLP

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Police Benevolent Association, Inc.**

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PROOF OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing **Appellant's Motion for Extension of Time to File Initial Brief** upon all parties to this matter via electronic mail and/or U.S. Mail, pre-paid postage properly addressed to counsel of record as follows:

Ronald L. Richter, Jr., Esq.
Scott M. Mongillo, Esq.
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The Peoples Building Mezzanine Level
18 Broad Street
Charleston, SC 29401
Counsel for Plaintiffs

Eric S. Bland, Esq.
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P.O. Box 72
Columbia, SC 29202
Counsel for Plaintiffs

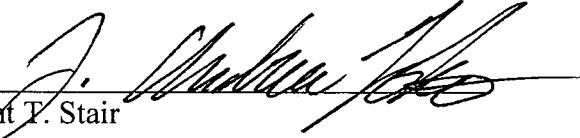
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15 Prioleau Street
Charleston, SC 29401
Counsel for Plaintiffs

May 28, 2019

Respectfully submitted,

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**Attorneys for Defendant Southern States
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REPLY TO CHARLESTON
OFFICE

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SC Court of Appeals

VIA U.S. MAIL

Jenny Abbott Kitchings
Court of Appeals Clerk of Court
P.O. Box 11629
Columbia, SC 29211

Re: Donald Stanley, *et al.* v. Southern States Police Benevolent Association, Inc.
Appellate Case No.: 2019-000182
CCS File No.: 4535-55135

Dear Ms. Kitchings:

Enclosed for filing, please find an original and six (6) copies of Appellant's Motion for Extension of Time to File Initial Brief regarding the above-referenced matter. I also enclose a check in the amount of \$50.00 to cover the cost of filing. Please file the Motion and return a file-stamped copy in the self-addressed envelope enclosed for your convenience.

By copy of this correspondence, I have served the same upon all counsel of record. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely yours,

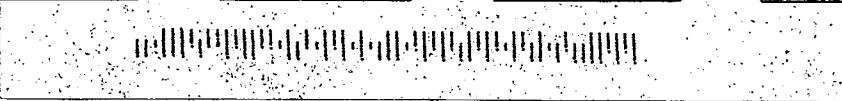


J. ANDREW YOHO

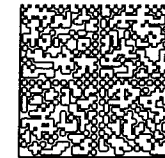
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Enclosures

cc: All Counsel of Record (via U.S. mail & e-mail)



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**CARLOCK
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