

90306

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**  
JUL 18 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 SECOND EXTENSION TO FILE APPELLANT'S REPLY BRIEF**

The Appellant, City of North Charleston, through its undersigned counsel, hereby requests of this Honorable Court a second, brief extension of time in which to file Appellant's Reply Brief in the above-referenced matter. Pursuant to the Court's Order dated June 21, 2019, Appellant's Reply Brief and related designation of matter is due Friday, July 19, 2019. Obligations of Appellant's counsel on other cases and related to other deadlines necessitate an extension of time in order for the undersigned firm to prepare Appellant's Reply Brief. The undersigned certifies he spoke with Respondents' counsel who consents to this Motion.

For the reasons discussed, the undersigned respectfully requests a ten (10) day extension, until Monday, July 29, 2019, in which to prepare Appellant's Reply Brief and

related designation of matter.

Respectfully submitted,



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Attorneys for Appellant.

Charleston, South Carolina

Date: 7/17/19

Other Counsel of Record:

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Attorney for Respondent

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**PROOF OF SERVICE OF MOTION FOR SECOND EXTENSION TO FILE  
APPELLANT'S REPLY BRIEF**

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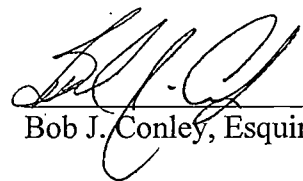
Caroline Cleveland  
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[eferguson@clevelandlaborlaw.com](mailto:eferguson@clevelandlaborlaw.com)

Attorneys for Appellant

I hereby certify that on July 17, 2019, I served a copy of Appellant's Motion for Second Extension to File Appellant's Reply Brief 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: July 17, 2019

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

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BOB J. CONLEY  
EMMANUEL J. FERGUSON

†CERTIFIED SPECIALIST,  
LABOR & EMPLOYMENT LAW

July 17, 2019

TELEPHONE: (843) 577-9626  
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The Honorable Jenny Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

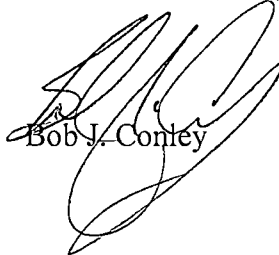
Re: *Alvar R. Rissanen et al. v. City of North Charleston*  
Appellate Case No.: 2019-000332

Dear Ms. Kitchings:

Enclosed for filing is the original and six copies of Appellant's Motion for Second Extension to File Appellant's Reply Brief. Additionally, enclosed is the original Proof of Service of Appellant's Motion for Second Extension to File Appellant's Reply Brief. Finally, enclosed is the \$50.00 filing fee.

Yours truly,

CLEVELAND & CONLEY, LLC

  
Bob J. Conley

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

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