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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

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

**RECEIVED**  
AUG 15 2019  
SC Court of Appeals

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

Respondents,

v.

Southern States Police Benevolent Association,  
Inc.

Appellant.

**RESPONDENTS' PETITION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEF**

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 thirty (30) days' time to file and serve Respondents' Initial Brief.

Appellant Southern States Police Benevolent Association served its Initial Brief on July 22, 2019. Rule 208(a), SCACR, provides that Respondents shall file and serve their Initial Brief

within thirty (30) days after service of the Appellant's Brief. Thus, Respondents' Initial Brief is currently due on August 21, 2019.

Due to work-related and other time commitments and also due to the complexity of this class action matter, the undersigned counsel for Respondents requests the Court's allowance of thirty (30) days' additional time to file and serve Respondents' Initial Brief.

Appellant has consented in writing to the request for a thirty (30) day extension of time to file and serve Respondents' Initial Brief.

Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Appellants request that the Court grant an extension of thirty (30) days' time (running from July 22, 2019) to file their Initial Brief. By the undersigned's calculations, if this request is granted, the new deadline to file the Initial Brief would be August 21, 2019.

ADDITIONALLY, for the same reasons set forth in support of the within request for an extension of time, Respondents requests that the Court hold the present deadline for filing the Initial Brief in abeyance until the Court acts on this motion.

Respectfully submitted,

PIERCE, HERNS, SLOAN & WILSON, LLC

By:



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

Charleston, South Carolina  
August 13, 2019

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

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Court of Common Pleas

Edward W. Miller, Circuit Court Judge

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Individually and as Class Representatives,

v.

Southern States Police Benevolent Association, Appellant.  
Inc.

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**PROOF OF SERVICE**

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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 **PETITION OF RESPONDENTS FOR EXTENSION OF TIME TO FILE/SERVE RESPONDENTS' INITIAL BRIEF** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on August 13, 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:   
\_\_\_\_\_  
*for* 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: 8/13/19

# PIERCE | SLOAN

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August 13, 2019

**VIA U.S. MAIL**

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

**RECEIVED**  
AUG 15 2019  
SC Court of Appeals

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 Respondents' Petition for Extension of Time to File Initial Brief 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)

