

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Appellate Case No. 2019-000182

RECEIVED
SEP 27 2019
SC Court of Appeals

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

v.

Southern States Police Benevolent Association, Inc.,Appellant.

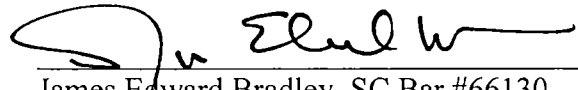
**APPELLANT’S MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF**

The undersigned, as counsel for the Appellant hereby moves for an eighteen (18) day extension of time to file its Reply Brief. This document is currently due on or before September 30, 2019.

Appellant’s counsel wishes to have additional time in order to prepare Appellant’s Reply Brief due work-related commitments and also due to the complexity of this class action matter. This is counsel’s first request for an extension for its Reply Brief. Further, there would be no prejudice to the parties by an extension of time. Accordingly, counsel respectfully moves for an eighteen-day extension in which to file the Appellant’s Reply Brief. By the undersigned’s calculations the extension, if granted, would extend Appellant’s deadline for filing its Reply Brief to October 18, 2019.

Respectfully submitted,

September 27, 2019



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**Attorneys for Appellant Southern States
Police Benevolent Association, Inc.**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SC Court of Appeals

Edward W. Miller, Circuit Court Judge

Case No. 2016-CP-10-04062

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

v.

Southern States Police Benevolent Association, Inc., Appellant.

PROOF OF SERVICE

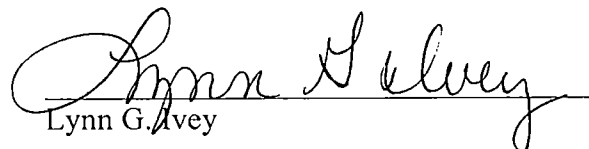
I, Lynn G. Ivey, an employee of the Moore Taylor Law Firm, P.A., certify that I have served the Appellant's Motion for Extension of Time to File Reply Brief by depositing copies of same in the United State Mail, postage prepaid, on September 27, 2019, addressed to the attorneys of record as follows:

Ronald L. Richter, Jr., Esquire
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18 Broad Street, Mezzanine
Charleston, SC 29401

Eric S. Bland, Esquire
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Lynn G. Ivey

West Columbia, South Carolina
September 27, 2019

September 27, 2019

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

RECEIVED

SEP 27 2019

SC Court of Appeals

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

S. Jahue Moore†
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Ralph Nichols Riley, Jr.
Amber Cary Fulmer
Lester McGill Bell, Jr.
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C. David Sawyer, Jr.†
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1916-2019

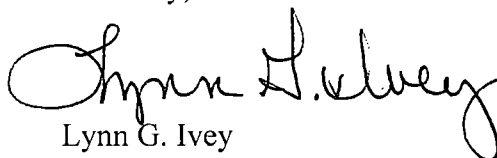
Dear Ms. Kitchings:

Enclosed for filing is the original and eight copies of Appellant's Motion for Extension of Time to File Reply Brief, Proof of Service, and our firm check for \$50.00 for the filing fee. Please have the extra copies clocked in and returned to us via our courier.

By copy of this letter, I am serving counsel of record with the Appellant's Motion for Extension of Time to File Reply Brief as well.

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)
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