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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

The Honorable Frank Addy, Circuit Court Judge

Tony Young.....Appellant,

v.

The Greenwood County Sheriff's Office.....Respondent.

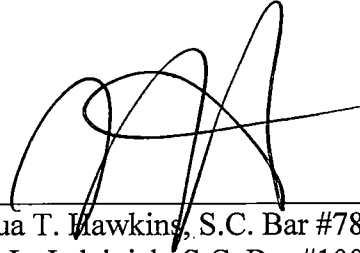
Appellate Case No. 2019-000637

MOTION FOR EXTENSION OF TIME

The appellant respectfully requests that the Appellate Court grant an extension of time for the appellant to file his initial brief. Currently the initial brief is due October 8, 2019 and the Appellate Court has graciously granted one extension already due to the undersigned being out of the country for a good portion of August 2019. As is the nature of travel, the undersigned has been particularly busy since his return, and has completed a significant amount of work on this appeal. However, since the trial transcript is 651 pages and there are several issues that require briefing, the undersigned respectfully requests that the Court extend the time to respond until November 7, 2019. The undersigned appreciates that should the Court grant this motion, no other extensions will be granted barring extenuating circumstances. The undersigned beseeches the Court to consider that his firm is small – two attorneys and one paralegal – and that the firm is currently involved in multiple appeals and is currently preparing for an upcoming trial outside of South Carolina.

The appellant has consulted with counsel for the respondent, Rusty Harter, and the respondent has graciously consented to an extension, should the Court grant the extension. The appellant therefore respectfully requests a thirty-day extension of time to file his initial brief.

September 16, 2019



Joshua T. Hawkins, S.C. Bar #78470
Helena L. Jedziniak, S.C. Bar #100825
Hawkins & Jedziniak, LLC
1225 South Church Street
Greenville, South Carolina 29605
(864) 275-8142 (telephone)
(864) 752-0911 (facsimile)
josh@hjlsc.com
helena@hjlsc.com
Attorneys for Appellants

Mr. Rusty Harter, Esq.
Chapman, Harter & Harter, P.A.
14 Lavinia Avenue
Greenville, South Carolina 29601
(864) 233-4500 (telephone)
Attorney for Respondent Greenwood County Sheriff's Office

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PROOF OF SERVICE

I certify that I served a Motion for an Extension of Time to file the plaintiff's initial brief on The Greenwood County Sheriff's Office by depositing a copy of it in the United States Mail, postage prepaid, on September 17, 2019, addressed to its attorney of record, Rusty Harter, Esq., 14 Lavinia Avenue, Greenville, South Carolina 29601.



David Schroeder, PhD
Certified Paralegal
Hawkins & Jedziniak, LLC
1225 South Church Street
Greenville, South Carolina 29605
(864) 275-8142 (telephone)
(864) 752-0911 (facsimile)
david@hjlsc.com

Hawkins & Jedziniak, LLC

1225 South Church Street
Greenville, South Carolina 29605
Telephone: (864) 275-8142
Facsimile: (864) 752-0911
david@hjlsc.com

RECEIVED
SEP 19 2019
SC Court of Appeals

September 7, 2019

Ms. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: *Tony Young, Appellant v. Greenwood County Sheriff's Office, Respondent*
Appellate Case No. 2019-000637

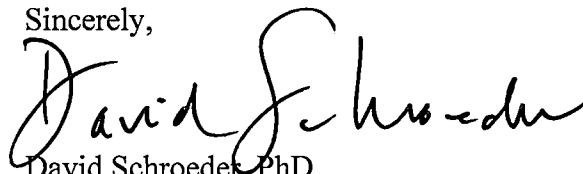
Dear Ms. Kitchings:

Please find enclosed for filing a motion for a second extension of time in the case referenced above. Also please find enclosed the following:

- ✓ six (6) copies of the motion as required by the rules;
- ✓ proof of service of the motion on the respondent; and
- ✓ the filing fee of \$50.00.

Mr. Rusty Harter, counsel for the respondent, has not objected to the appellant's request. Should you have any questions, please do not hesitate to contact our office.

Sincerely,


David Schroeder, PhD
Certified Paralegal

Enclosures

Copies:

Mr. Rusty Harter, Esq.
Chapman, Harter & Harter, P.A.
14 Lavinia Avenue
Greenville, South Carolina 29601
(864) 233-4500 (telephone)
Attorney for Respondent Greenwood County Sheriff's Office

South Carolina Office of Court Administration
1220 Senate Street
Columbia, South Carolina 29201-3739

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