

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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OCT 01 2019

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
THE HONORABLE L. CASEY MANNING
Circuit Court Judge
Fifth Judicial Circuit

CASE NO: 2018-CP-400-5641

RONALD I. PAUL.....Appellant,

V.

SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION; PAUL D. DE
HOLCZER, individually and as a partner of the law Firm of Moses, Koon &
Brackett, PC; MICHAEL H. QUINN, individually and as senior lawyer of
Quinn Law Firm, LLC; J. CHARLES ORMOND, JR., individually and as a
partner of the Law Firm of Holler, Dennis, Corbett, Ormond, Plant & Garner;
OSCAR K. RUCKER, in his individual capacity as, Director Rights of Way
South Carolina Department of Transportation; MACIE M. GRESHAM, in her
individual capacity as Eastern Region Right of Way Program Manager South
Carolina Department of Transportation; NATALIE J. MOORE, in her
individual capacity as assistant chief counsel South Carolina Department of
Transportation..... Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD**

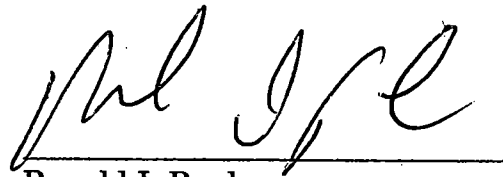
Pursuant to Rule 240(a) SCACR and Rule 263 (b) SCACR, Appellant,
Ronald I. Paul, respectfully requests an extension of thirty (30) days to file
his Initial Brief and Designation of Matter to be Included in the Record. The

current due date is October 7, 2019. Appellant respectfully request the Court to Grant an extension of thirty (30) additional days or until November 7, 2019 to serve and file the Initial Brief and Designation of matter to be Included in the Record.

Appellant has a pending Motion to Hold the Appeal in Abeyance and, at this time and point needs additional time to properly prepare his Initial Brief and Designation of matter to be Included in the Record. Appellant has consulted with all Respondents or all Respondents counsel and they have not responded.

Accordingly, Appellant respectfully requests an extension of time in which to file his Initial Brief and Designation of Matter to be Included in the Record until November 7, 2019 and, request that the pending Motion to Hold Appeal in Abeyance be decided at the Court's earliest opportunity.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald I. Paul", written over a horizontal line.

Ronald I. Paul
Post Office Box 4353
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Appellant, *Pro Se* litigant
(803) 414-2305

Other Counsel of Record:

ANDREW F. LINDEMANN
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Attorney for Defendants South Carolina Department of Transportation,
Oscar K. Rucker, Macie M. Gresham, Natalie J. Moore and Paul D. de Holczer.

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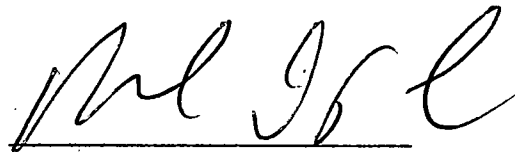
V.

SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION; PAUL D. DE HOLCZER, individually and as a partner of the law Firm of Moses, Koon & Brackett, PC; MICHAEL H. QUINN, individually and as senior lawyer of Quinn Law Firm, LLC; J. CHARLES ORMOND, JR., individually and as a partner of the Law Firm of Holler, Dennis, Corbett, Ormond, Plant & Garner; OSCAR K. RUCKER, in his individual capacity as, Director Rights of Way South Carolina Department of Transportation; MACIE M. GRESHAM, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; NATALIE J. MOORE, in her individual capacity as assistant chief counsel South Carolina Department of Transportation..... Respondents.

PROOF OF SERVICE

I, Ronald I. Paul hereby certify that I have served the Appellant Motion for extension of time to file Appellant Initial Brief and Designation of Matter to be Included in the Record on all Respondents South Carolina Department of Transportation; Paul D. de Holczer individually, and as a partner of the law Firm of Moses, Koon & Brackett, P.C; Michael H. Quinn, individually and as senior lawyer of Quinn Law Firm,

LLC; J. Charles Ormond, Jr., individually and as a partner of the Law Firm of Holler, Dennis, Corbett, Ormond, Plant & Garner; Oscar K. Rucker, in his individual capacity as, Director Rights of Way South Carolina Department of Transportation; Macie M. Gresham, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; Natalie J. Moore, in her individual capacity as assistant chief counsel South Carolina Department of Transportation by depositing a copy of it in the United State Mail, postage prepaid, on this date, October 1, 2019, addressed to the attorney of record or *Pro Se* Litigants and others as listed below.



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Appellant, *Pro Se* Litigant

RESPONDENTS COUNSEL OF RECORD

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