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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Honorable Doyet A. Early, Circuit Court Judge

RECEIVED
OCT 09 2019
SC Court of Appeals

Case No. 2018-CP-40-02425

Appellate Case Number: 2019-000648

Jefferson Davis, Jr., Appellant,

v.

Ellen Weaver, Chad Connelly, Oran P. Smith, Neil J. Mellen, Howard S. Rich, Rick Reames, Stephen D. Kirkland, Palmetto Promise Institute, Palmetto Family Council, Palmetto Family Action, South Carolinians for Responsible Government, SCRG Foundation, Access Opportunity South Carolina, Friedman Foundation for Educational Choice, Inc., Cato Institute, South Carolina Education Credit for Exceptional Needs Children Fund, South Carolina Oversight Committee, South Carolina Department of Revenue, South Carolina Department of Labor, Licensing and Regulations, First Impressions, Inc. d/b/a Richard Quinn & Associates, First Tuesday Strategies, LLC, Bill Wilson, Jason Bedrick, Jim DeMint, Randy Page, Tony Denny, Phillip Cease, Melanie Barton, Doris Cubitt, Susan Thomas, John McCormick, Nate Leupp, Institute of Management Consultants USA & John Doe(s) 1-40,

..... Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER FOR RECORD ON APPEAL ON BEHALF
OF RESPONDENTS RICK REAMES AND SOUTH CAROLINA
DEPARTMENT OF REVENUE**

Respondents Rick Reames and South Carolina Department of Revenue, pursuant to Rules 208, 240, and 263 of the South Carolina Appellate Court Rules, hereby move for a thirty (30) day extension of time to file and serve their initial brief and designation of matter to be included in the record on appeal in the above-appeal and state the following:

1. The Appellant filed his initial brief and designation of matter to be included in the record on appeal in this matter on September 9, 2019.

2. Pursuant to SCACR 208(a)(2), the Respondents have thirty days to file their initial brief(s) and any counter-designations of matter to be included in the record on appeal.

3. The Respondents' current deadline of October 9, 2019 has not expired.

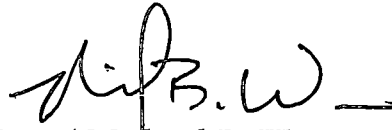
4. Respondents Rick Reames and South Carolina Department of Revenue request a thirty (30) day extension of time from the aforementioned deadline to file their initial brief and any counter-designations of matter to be included in the record on appeal, with such new deadline being November 8, 2019.

5. The undersigned counsel for Respondents Rick Reames and South Carolina Department of Revenue was recently involved in a lengthy jury trial in the Richland County Court of Common Pleas for which the requested extension of

time is necessary to prepare the responsive brief, and this motion is further made in good faith and not for purposes of delay.

WHEREFORE, Respondents Rick Reames and South Carolina Department of Revenue respectfully request a thirty (30) day extension of time until November 8, 2019, in which to file and serve their initial brief and designation of matter to be included in the record on appeal in this matter.

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BY: s/ Michael B. Wren

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RICK REAMES AND SOUTH
CAROLINA DEPARTMENT OF
REVENUE

Columbia, South Carolina
October 9, 2019

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In The Court of Appeals

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..... Respondents.

CERTIFICATE OF SERVICE

Certificate of Service

Appellate Case Number: 2019-000648

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The undersigned employee of Davidson, Wren & Plyler, P.A., attorneys for the Respondents Rick Reames and South Carolina Department of Revenue, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief and Designation of Matter for Record on Appeal on Behalf of Respondents Rick Reames and South Carolina Department of Revenue** in the above-captioned action was made upon all parties and counsel of record via email at the below listed email address on this 9th day of October, 2019.

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Certificate of Service

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October 9, 2019

Via Hand Delivery

The Honorable Jenny A. Kitchings

South Carolina Court of Appeals

1220 Senate Street

Columbia, South Carolina 29201

RE: Jefferson Davis, Jr. v. Ellen Weaver, *et al.*

Civil Action Number: 2018-CP-40-02425

Appellate Case No. 2019-000648

Claim Number: C4358

Date of Incident:

Our File Number: 103.10474

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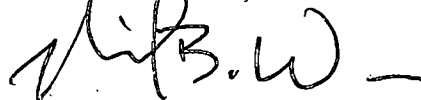
Dear Ms. Kitchings:

Enclosed are the original and seven copies of our **Motion for Extension of Time to File Initial Brief and Designation of Matter for Record on Appeal on Behalf of Respondents Rick Reames and South Carolina Department of Revenue**, along with our **Certificate of Service**, in the above-referenced matter. Please file the original and six copies, and return a clocked in copy to me in the enclosed envelope via courier. Also, enclosed is the requisite filing fee in the amount of \$50.00.

By copy of this letter, I am herewith serving a copy of same via email to all parties and counsel of record.

Very truly yours,

DAVIDSON, WREN & PLYLER, P.A.



Michael B. Wren

MBW/ldrt

Enclosure

cc: (with Enclosure)

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