

**THE STATE OF SOUTH CAROLINA  
In the Supreme Court**

---

**APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas**

**Honorable Alison Renee Lee, Circuit Court Judge**

**RECEIVED**

NOV 27 2019

S.C. SUPREME COURT

---

**Opinion No. 5669 (filed July 24, 2019)  
Appellate Case No.: 2015-00613  
Supreme Court Case No.: 2019-001928**

---

Jeffrey Kennedy.....Respondent,

v.

Richland County School District Two, Eric Barnes, and Chuck Earles.....Petitioners.

---

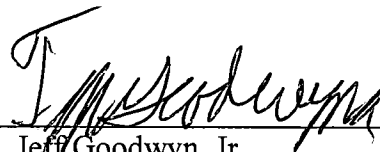
**RESPONDENT'S MOTION FOR EXTENSION OF TIME  
TO FILE RETURN TO PETITION FOR WRIT OF CERTIORARI**

---

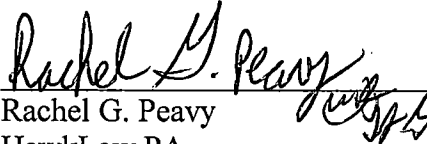
Pursuant to Rule 263, SCACR, Respondent respectfully moves the Court for a thirty (30) day extension of time, to January 22, 2020, to file and serve his Return to Petition for Writ of Certiorari. Respondent's counsel requires additional time due to the Thanksgiving and Christmas holidays. This motion is being submitted in good faith and is not intended for purposes of delay.

The Respondent has conferred with Thomas K. Barlow, Esquire, Counsel for the Petitioners, and the Petitioners consent to this thirty (30) day extension.

*-Signature Page Follows-*



T. Jeff Goodwyn, Jr.  
Goodwyn Law Firm, LLC  
2519 Devine Street, Suite A  
Columbia, South Carolina 29205  
(803) 251-4517  
(803) 251-4527  
[jgoodwyn@goodwynlaw.com](mailto:jgoodwyn@goodwynlaw.com)



Rachel G. Peavy  
HawkLaw PA  
Mailing Address:  
PO Box 5048  
Spartanburg, South Carolina 29304

Street Address:  
1835 Gervais Street  
Columbia, South Carolina 29201

*Attorneys for Petitioner*

Columbia, South Carolina

November 27, 2019

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

RECEIVED

NOV 27 2019

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

S.C. SUPREME COURT

Honorable Alison Renee Lee, Circuit Court Judge

Opinion No. 5669 (Filed July 24, 2019)  
Appellate Case No.: 2015-00613  
Supreme Court Case No.: 2019-001928

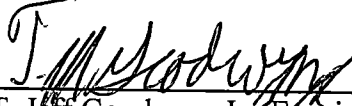
Jeffrey Kennedy.....Respondent,

v.

Richland County School District Two, Eric Barnes and Chuck Earles.....Petitioners.

**CERTIFICATE OF SERVICE**

I certify that I have served the **Motion for Extension of Time** by depositing a copy of same in the United States Mail, postage prepaid, on **November 27, 2019**, addressed to counsel for Respondents, Thomas K. Barlow, Esquire and Kathryn Long Mahoney, Esquire, at the Law Firm of Halligan, Mahoney & Williams, PA to P.O. Box 11367, Columbia, SC 29211 and by filing the original, via hand delivery, to the South Carolina Supreme Court, 1231 Gervais Street, Columbia, South Carolina.

  
\_\_\_\_\_  
T. Jeff Goodwyn, Jr., Esquire  
Goodwyn Law Firm, LLC  
2519 Devine Street, Suite A  
Columbia, SC 29205

November 27, 2019