

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

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

**Jocelyn Newman, Circuit Court Judge**

**C.A. No.: 2019-000951**

**RECEIVED  
DEC 06 2019  
SC Court of Appeals**

K.S., a minor, by and through his Guardian ad Litem, James Seeger ..... Appellants

v.

Richland School District Two ..... Respondent.

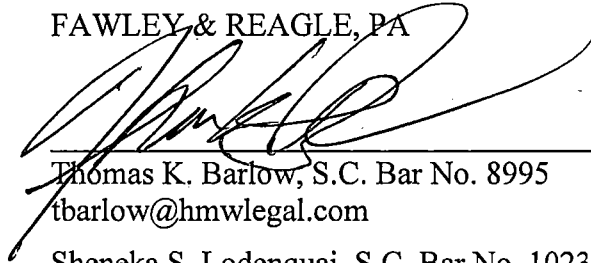
**MOTION FOR EXTENSION OF TIME**

Pursuant to Rule 263(b), SCACR, Respondent, Richland County School District Two, respectfully moves the Court for a thirty (30) day extension of time in which to file its Initial Brief, up to and including Tuesday, January 21, 2020. Without an extension, Respondent's Initial Brief would be due on December 23, 2019. Respondent's Counsel requires additional time due to the volume of the transcript of record, as well as other case demands, scheduling issues and long-standing Christmas vacation plans, and this motion is submitted in good faith and is not intended for purposes of delay.

Counsel for Respondent has conferred with Brian C. Gambrell, Counsel for the Appellants, and Appellants consent to this thirty (30) day extension.

Respectfully submitted,

HALLIGAN MAHONEY WILLIAMS SMITH  
FAWLEY & REAGLE, PA



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Columbia, SC 29211  
(803) 254-4035

Attorneys for Respondent

December 6, 2019  
Columbia, South Carolina

Other Counsel of Record:

Brian C. Gambrell  
The Law Offices of Jason E. Taylor, P.C.  
810 Dutch Square Blvd., Suite 112  
Columbia, SC 29210

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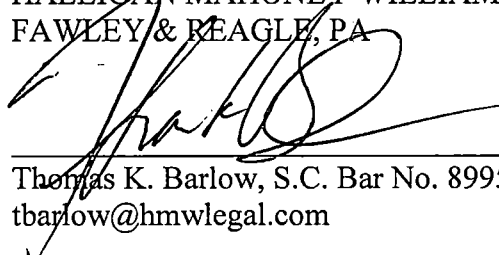
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**PROOF OF SERVICE**

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I certify that I have served a copy of the aforementioned Motion for Extension of Time by depositing a copy of it in the United States Mail, postage prepaid, on December 6, 2019, addressed to Brian C. Gambrell, The Law Offices of Jason E. Taylor, P.C., 810 Dutch Square Blvd., Suite 112, Columbia, SC 29210.

HALLIGAN MAHONEY WILLIAMS SMITH  
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# HALLIGAN MAHONEY & WILLIAMS

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December 6, 2019

## VIA HAND DELIVERY

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

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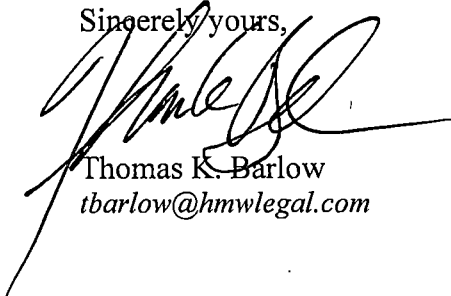
Re: James Seeger v. Richland School District Two  
Appellate Case No. 2019-000951

Dear Ms. Kitchings:

Enclosed for filing please find an original and one copy of a Motion for Extension of Time and Proof of Service in the above-referenced matter, together with the \$50 filing fee. Please return the extra file-stamped copy of the motion to our office via our courier.

Thank you for your attention to this matter.

Sincerely yours,



Thomas K. Barlow  
tbarlow@hmwlegal.com

/lmc  
Enclosures

c: Brian C. Gambrell, Esq.  
Sheneka S. Lodenquai, Esq.



**HALLIGAN MAHONEY  
& WILLIAMS**

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