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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Alison Renee Lee, Circuit Court Judge

Appellate Case No. 2019-000566  
Case No. 2016-CP-40-0387

Sammie L. Goodwin,.....

Appellant,

v.

Richland County Sheriff Department, Richland County  
Sheriff Leon Lott in his official capacity, .....

Respondents.

MOTION FOR EXTENSION OF TIME TO  
FILE INITIAL BRIEF OF RESPONDENTS

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JAN 02 2020

SC Court of Appeals

The Respondents Richland County Sheriff Department and Richland County Sheriff Leon Lott, in his official capacity, respectfully move this Court for an additional fifteen-day extension of time until January 17, 2020, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

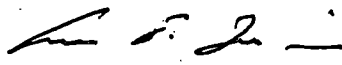
The Respondents' motion is based on the following grounds:

1. The Respondents' Initial Brief is currently due to be filed and served on January 2, 2020.

2. The undersigned counsel for the Respondents requires this additional time to complete the preparation and drafting of the Respondents' Initial Brief because of other obligations and deadlines, including another Court of Appeals brief due on January 2, 2020, another Court of Appeals brief that was due on December 30, 2019, and a Petition for Rehearing due in the South Carolina Supreme Court on January 2, 2020.

WHEREFORE, the Respondents respectfully request that they be allowed until January 17, 2020, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN, DAVIS & HUGHES, P.A.

BY:   
ANDREW F. LINDEMANN #13030  
5 Calendar Court, Suite 202  
Post Office Box 6923  
Columbia, South Carolina 29260  
(803) 881-8920

*Counsel for Respondents*

January 2, 2020

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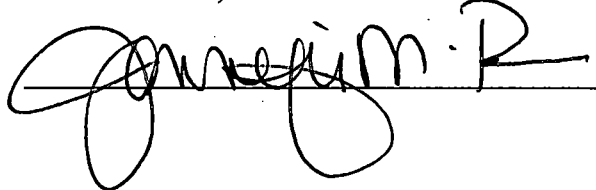
**CERTIFICATE OF SERVICE**

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The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Defendant, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Respondents** was made upon the *pro se* Appellant and all other counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelopes this the 2nd day of January 2020:

Mr. Sammie L. Goodwin  
317 Saddlefield Road  
Columbia, South Carolina 29203

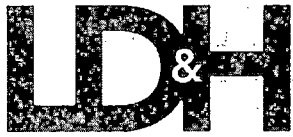
Robert D. Garfield, Esquire  
Crowe-LaFave, LLC  
Post Office Box 1149  
Columbia, South Carolina 29202

A handwritten signature in black ink, appearing to read "Robert D. Garfield", is written over a horizontal line.

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JAN 02 2020

SC Court of Appeals



**LINDEMANN  
DAVIS &  
HUGHES**

Telephone (803) 881-8920  
Facsimile (803) 862-1181

5 Calendar Court, Suite 202 (29206)  
Post Office Box 6923  
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January 2, 2020

**ANDREW F. LINDEMANN\***  
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*\*Also Admitted in North Carolina  
†Certified Mediator*

*Of Counsel*

**STEVEN R. SPREEUWERS**  
Direct Dial: (803) 373-2268  
Email: [steve@ldh-law.com](mailto:steve@ldh-law.com)

**Hand Delivered**

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

RE: Sammie L. Goodwin v. Richland County Sheriff Department, Richland County Sheriff  
Leon Lott in his official capacity  
Appellate Case Number: 2019-000566  
Civil Action Number: 2016-CP-40-0387  
Claim Number: Risk Management  
Our File Number: 314.20152

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Motion for Extension of Time to File Initial Brief of Respondents** in the above referenced matter. Please file the original and return a clocked-in copy to me by way of my courier. I have also enclosed my firm's \$50.00 check for the filing fee. By copy of this letter, I am serving a copy on the *pro se* Appellant.

If you have any questions, please advise.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.

Andrew F. Lindemann

AFL/jmb  
Enclosures

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JAN 02 2020  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
January 2, 2020  
Page Two

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cc: (w/ Enclosure)

Mr. Sammie L. Goodwin  
317 Saddlefield Road  
Columbia, South Carolina 29203

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Crowe LaFave, LLC  
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