

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Mark Hayes, Circuit Court Judge

Appellate Case No. 2018-002223

RECEIVED
Apr 14 2020
SC Court of Appeals

H. Hughes Andrews..... Respondent,

v.

Quentin Broom, Jr.....Appellant,

**APPELLANT’S FIRST MOTION FOR ADDITIONAL TIME
TO FILE INITIAL REPLY BRIEF**

Pursuant to Rules 240 and 263(b), SCACR, Appellant Quentin Broom, Jr., by and through undersigned counsel, respectfully moves for a 21-day extension of time in which to file his initial reply brief. If the extension is granted, Appellant’s initial reply brief would be due on Wednesday, May 6, 2020. In support of this motion, Appellant states as follows:

1. Respondent served his initial Respondent’s brief and designation of matter by mail on March 16, 2020. However, undersigned counsel did not receive the brief until March 20, 2020, presumably due to mail disruptions caused by the COVID-19 emergency.
2. Pursuant to Appellate Case Order No. 2020-000447, Appellant’s initial reply brief is currently due on Wednesday, April 15, 2020.

3. Appellant's counsel requires additional time for preparation of Appellant's initial reply brief. Among other things, work interruptions due to the COVID-19 emergency has slowed counsel's work on the reply brief.

4. This motion is made in good faith, and the requested extension is not being sought merely for purposes of delay.

5. Appellant requests an extension of 21 days from the current deadline of Wednesday, April 15, 2020, such that his initial reply brief would be due on or before Wednesday, May 6, 2020. This is Appellant's first request for an extension of time to file his reply brief.

6. Pursuant to Appellate Case Order No. 2020-000447, no filing fee is required for this motion for extension of time.

WHEREFORE, Appellant respectfully requests an extension to Wednesday, May 6, 2020, to file his initial reply brief.

Respectfully submitted,

April 14, 2020
Columbia, SC

s/ James E. Cox, Jr.

James E. Cox, Jr.

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PROOF OF SERVICE

Pursuant to Appellate Case Order No. 2020-000447, the undersigned hereby certifies that on April 14, 2020, he served counsel for Respondent with the *Appellant's Motion for Additional Time to File Initial Reply Brief* in this matter by sending the document via email to the email listed in the Attorney Information System as follows:

Rodney Pillsbury
rodnev@pillsburyfirm.law

Respectfully submitted,

/s/ James E. Cox, Jr.
James E. Cox, Jr.

From: James E. Cox, Jr.
Sent: Tuesday, April 14, 2020 10:09 AM
To: 'Rodney@PillsburyFirm.law'
Cc: Matthew T. Richardson; Whitney Harrison (wharrison@mcgowanhood.com); Laura Diaz
Subject: Broom v Andrews -- Appellant's Motion for Extension of Time to File Reply Brief
Attachments: Broom v. Andrews -- Appellant's Motion for Extension of Time to File Initial Reply Brief (01000191x9F4BC).PDF

Rodney,

I hope you have been well. I am attaching Appellant's Motion for Extension of Time to File Reply Brief in the Broom v. Andrews case, which we are filing today. Let me know if you have any questions.

Best, Jim



James E. Cox, Jr. | Wyche

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A Lex Mundi Member Firm

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Apr 14 2020

SC Court of Appeals

Fax

From**To**

Clerk of Court, Court of
Appeals, Fax #
803-734-1839

Number of pages

5

RECEIVED**Apr 14 2020****SC Court of Appeals****Message**

Dear Court of Appeals Clerk of Court, Please find enclosed for filing the Appellant's Motion for Extension of Time to File Initial Reply Brief in Broom v. Andrews, Case No. 2018-002223. Please do not hesitate to contact me if you have any questions. Best, Jim Cox, 864-242-8212
4 pages + cover sheet