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APR 16 2020

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

The Honorable Frank Addy, Circuit Court Judge

Tony Young.....Appellant,

v.

The Greenwood County Sheriff's Office.....Respondent.

Appellate Case No. 2019-000637

MOTION FOR STAY OF DEADLINES

The appellant respectfully requests that the Appellate Court grant a stay of the deadline for the appellant to file his Record on Appeal. Due to COVID-19, courts are closed to the public all over the state, and we are unable to retrieve copies of needed documents for submission by the current deadline. The appellant is aware of the order issued on March 20, 2020, which extends all deadlines, excluding initial notice of appeal, for twenty (20) days, and previously filed a Motion for Extension on March 25, 2020, out of an abundance of caution. However, with the current health crises remaining uncertain and without knowing when operating hours will return to normal, we respectfully request that the deadline be stayed until we are able to retrieve the necessary documents.

For the foregoing reasons, the appellant respectfully requests a stay of deadlines to file his Record on Appeal.

s/Joshua T. Hawkins
Joshua T. Hawkins, S.C. Bar #78470
Helena L. Jedziniak, S.C. Bar #100825
Hawkins & Jedziniak, LLC
1225 South Church Street
Greenville, South Carolina 29605

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Attorneys for Appellants

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South Carolina Office of Court Administration
1220 Senate Street
Columbia, South Carolina 29201-3739

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APR 10 2020

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Frank Addy, Circuit Court Judge

Tony Young.....Appellant,

v.

The Greenwood County Sheriff's Office.....Respondent.

Appellate Case No. 2019-000637

PROOF OF SERVICE

I certify that I served a copy of the Motion for Stay of Deadlines to file Record on Appeal of Appellant on the following counsel of record for the Respondent and mailed the required copies to Court Administration, by depositing copies of it in the United States Mail, postage prepaid, on April 8, 2020, addressed to the following addresses:

Mr. Rusty Harter, Esq.
Carly H. Davis
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Attorney for Respondent Greenwood County Sheriff's Office

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s/ Joshua T. Hawkins

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SC Court of Appeals

April 8, 2020

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

Re: *Tony Young v. The Greenwood County Sheriff's Office*
Appellate Case No. 2019-0000637

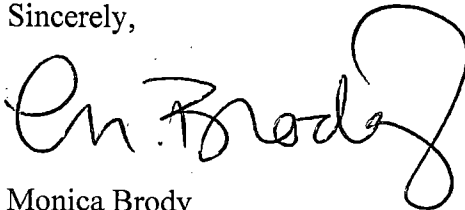
Dear Ms. Kitchings,

Please find enclosed for filing Appellant's Motion for Stay of Deadlines for Time to file Record on Appeal in the above-mentioned case. In accordance with the Operation of the Appellate Courts During the Coronavirus Emergency Order put in place on March 20, 2020, there are no additional copies included; however, please also find enclosed the following:

- ✓ Proof of service to all parties;
- ✓ Filing fee of \$50.00

Should you have any questions, please do not hesitate to contact our office.

Sincerely,



Monica Brody
Paralegal

Enclosures

Copies:

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Chapman, Harter & Harter, P.A.
14 Lavinia Avenue
Greenville, South Carolina 29601
(864) 233-4500 (telephone)
Attorney for Respondent Greenwood County Sheriff's Office

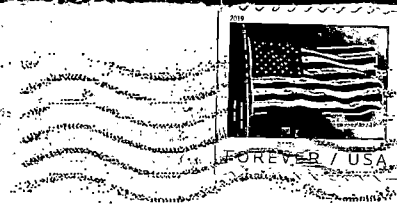
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SC Court of Appeals

29201-376999

