

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Apr 24 2020

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Walton J. McLeod, Circuit Court Judge

CASE NO. 09-CP-40-01307
CASE NO. 13-CP-40-02159

Frieda H. Dortch, Appellant,

v.

City of Columbia, Planning & Development Services/Zoning Division a/k/a City of Columbia
Board of Zoning Appeals, Respondent.

MOTION FOR 10-DAY EXTENSION OF TIME
TO FILE INITIAL REPLY BRIEF

M. Baron Stanton (S.C. Bar #7970)
STANTON LAW OFFICES, P.A.
1728 Main Street (29201)
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Columbia, SC 29202
803-929-1484
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ATTORNEY FOR APPELLANT
FRIEDA H. DORTCH

Appellant Dortch moves the Court pursuant to Rule 263 (b), SCACR and S.C. Sup. Ct. Ord. 2020-03-20-1, for an order granting an extension of an additional ten days, if needed, in which to file the Initial Reply Brief. The current deadline, based on date of mailing of the Initial Respondent's Brief, is April 27, 2020. Opposing counsel has been consulted and consents to the request.

The grounds for this motion, which the undersigned hereby affirms under penalty of perjury are correct, are that good cause exists, to wit, despite efforts of undersigned counsel to schedule work, personal, and family commitments around the anticipated extended date for receipt of the Initial Respondent's Brief and to account for the ensuing time to respond, the time of receipt of said brief changed by consent, as did work, personal, and family commitments, and this was amid the COVID-19 crisis, which created additional impediments such as lack of staff, time out of the office, time setting up better remote-work technology, time counseling clients, employees and tenants on COVID-19 relief measures, various inefficiencies, etc.

For the foregoing and other reasons which could be provided, Appellant Dortch requests until May 7, 2020 to file the brief.

Respectfully submitted,

s/M. Baron Stanton

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CERTIFICATE OF SERVICE

I, M. Baron Stanton, do hereby certify that I have, on April 24, 2020 served the foregoing
Motion for 10-Day Extension of Time to File Initial Reply Brief upon the Respondent by
causing a copy thereof to be e-mailed as indicated in the attached e-mail copy pursuant to S.C.
Sup. Ct. Ord. 2020-03-20-1, to the address indicated below:

peteb@rplfirm.com
(Peter M. Balthazor, Esquire)

s/M. Baron Stanton
M. Baron Stanton

B stanton

From: B stanton <bstanton@stantonlaw.com>
Sent: Friday, April 24, 2020 4:01 PM
To: 'Pete Balthazor'
Subject: RE: Dortch
Attachments: Motion for 10-Day Extension on Reply Brief.pdf

Pete, attached and served is a copy of the motion we are filing by fax today, to 803-734-1839. The only thing not included is a copy of this e-mail, which will be printed out and will include only our communications of April 24, today.

Thank you for your cooperation on the matter.

Best,

Barry

Cell 803-530-2642
Offc. 803-9291484
POB 245
Cola., SC 29202

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From: Pete Balthazor <peteb@rplfirm.com>
Sent: Friday, April 24, 2020 1:13 PM
To: Barry Stanton <bstanton@stantonlaw.com>
Subject: RE: Dortch

Yes.

Pete

From: Barry Stanton [<mailto:bstanton@stantonlaw.com>]
Sent: Friday, April 24, 2020 12:53 PM
To: Pete Balthazor
Subject: RE: Dortch

Pete, now I need an extension of 10 days. Will you consent?

Best,

Barry

Barry Stanton 803-530-2642
Office 803-929-1484

CONFIDENTIALITY NOTE:

The information contained in this facsimile message is legally privileged and confidential information intended only for the use of the individual or entity named below. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this telecopy is strictly prohibited. If you have received this telecopy in error, please immediately notify us by telephone and return the original message to us via the United States Postal Service. Thank you.

TELEFAX TRANSMITTAL FORM

PLEASE DELIVER THE FOLLOWING PAGES IMMEDIATELY

TO:

Name: Clerk, S.C. Court of Appeals Firm: _____
 Fax No. Called: 803-734-1839 City: Cola.
 Date: 4/24/20 State: _____
 Time: e. 4:10 p.m. Phone No.: _____

FROM:

Name: Barry Stanton
 Fax Number: 803-929-0534
 Phone Number: 803-929-1484
 Firm: Stanton Law Offices, P.A.
1728 Main Street (29201)
Post Office Box 245 (29202)
Columbia, South Carolina

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NOTES/SPECIAL INSTRUCTIONS:

Ladies or gentlemen, we are filing
by fax, the following motion for
extension of time.
Thank you for your assistance.

Barry Stanton
bstanton@stantonlaw.com