

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

The Honorable Donald B. Hocker

Appellate Case No. 2019-001514
Civil Action No. 2015GP3000624

Martha Foster Watts, Appellant

v.

Ricky W. Chastain, Sheriff Laurens County
South Carolina, Respondent.

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MAY 04 2020

SC Court of Appeals

**RESPONDENT'S
SECOND MOTION FOR EXTENSION**

The respondent respectfully requests an additional thirty (30) day extension of time within which to file his Initial Response Brief and Designation of Matter. Counsel for the respondent respectfully requests this extension as a result of hardships resulting from the ongoing coronavirus pandemic. Specifically, counsel for the respondent is working from home, homeschooling her step-daughter, and caring for her two year old and one year old children. In light of the circumstances counsel is unable to work the same hours and respectfully requests additional time

within which to complete the Initial Response Brief. Counsel for the appellant consents to this extension.

Based on the foregoing, counsel for respondent respectfully submits that, upon information and belief, the ends of justice would be best served through the granting of this request.

s/ Carly H. Davis,
Russell W. Harter, Jr., #2778
Carly H. Davis, #100112
Chapman, Harter & Harter, P.A.
14 Lavinia Avenue
Post Office Box 10224 (29603)
Greenville, South Carolina 29601
Telephone: (864) 233-4500
Attorneys for Respondent

April 24, 2020

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

The Honorable Donald B. Hocker, Circuit Court Judge

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Appellate Case Number: 2019-001514

SC Court of Appeals

Martha Foster Watts, Appellant,

v.

Ricky W. Chastain, Sheriff
Laurens County, South Carolina. Respondent

PROOF OF SERVICE

I certify that I have served the Respondent's Second Motion for Extension of Time on Appellant by depositing a copy of same in the United States Mail, postage prepaid, on April 30, 2020, addressed to the attorneys of record, as indicated below.

Thomas J. Thompson
Townsend & Thompson
Post Office Box 215
Laurens, South Carolina 29360

s/ Russell W. Harter, Jr.
Russell W. Harter, Jr., #2778
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CHAPMAN, HARTER & HARTER, P.A.

ATTORNEYS AT LAW
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April 30, 2020

Jenny Abbott Kitchings
Clerk of Court
The South Carolina Court of Appeals
Post Office Box-11620
Columbia, South Carolina 29211

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RE: *Martha Foster Watts v. Ricky W. Chastain, Sheriff, Laurens County South Carolina*
Appellate Case No.: 2019-001514
Lower Court Civil Action Number: 2015-CP-30-00624
SCAC Claim Number: EV2013005339

Dear Madam Clerk:

With regard to the above matter, please find enclosed herewith Respondent's Second Motion for Extension along with filing fee of \$50.00. Also enclosed is our Proof of Service upon Appellant's counsel.

Warmest regards.

Yours very truly,
CHAPMAN, HARTER & HARTER, P.A.

Russell W. Harter, Jr.

Enclosure

Chapman, Harter & Harter, PA
P. O. Box 10224
Greenville, SC 29603

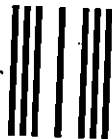
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