

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

Appellate Case No. 2019-001514
Civil Action No. 2015CP3000624

Martha Foster Watts, Appellant,

v.

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

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Jun 10 2020
SC Court of Appeals

**APPELLANT'S
MOTION FOR EXTENSION**

The Appellant, pursuant to Rule 240, SCACR, requests an additional twenty (20) day extension of time within which to file her initial Reply Brief.

Counsel for the Appellant respectfully requests this extension due to the following: a. Respondent's Initial Brief was served upon the undersigned on June 8, 2020; b. Respondent's Initial Brief is extensive (38 pages); c. the Record on Appeal is lengthy (approximately 450 pages); d. the undersigned must obtain the Exhibits from the Trial Court; e. the undersigned was not aware until June 9, 2020 that the extensions heretofore granted by the South Carolina Supreme Court had been revoked and that Appellant now must, unless an extension is granted, serve and file her Initial Reply Brief within ten (10) days of June 8, 2020; f. Petitioner and his staff have been laboring under hardships resulting from the COVID-19 pandemic; g. Petitioner has numerous cases that are now "time sensitive" due to recent South Carolina Supreme Court order(s) which now allow certain matters to immediately proceed; and h. Appellant, if required to serve and file her Initial Reply Brief within the ten (10) day requirement, will likely result in the Initial Reply Brief not addressing in an intelligent and in a manner acceptable to Appellant, the points raised in Respondent's Initial Brief. Appellant, in no manner, is attempting to delay this appeal for baseless or frivolous reasons, but seeks time to provide the Court with an intelligent and to the point Reply Brief in order to outline Appellant's arguments fully and accurately, which will benefit the Court in its consideration of the matter.

Counsel, for the Respondent consents to the proposed extension.

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

Dated: June 10, 2020

s/ Thomas J. Thompson

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**APPELLANT'S
PROOF OF SERVICE**

I certify that I have served the Appellant's Motion for Extension on Respondent by depositing a copy of it in the United States Mail, postage prepaid, on June 10, 2020, addressed to the attorneys of record, Russell W. Harter, Jr., Chapman, Harter & Harter, Post Office Box 10224, Greenville, South Carolina 29603 and A. Cruickshanks, IV., Post Office Box 786, Clinton, South Carolina 29325.

Dated: June 10, 2020



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