

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Bentley D. Price

Appellate Case No. 2020-000936

RECEIVED

Aug 24 2020

SC Court of Appeals

Skip Hoagland, Appellant,

v.

John Tecklenburg, in his official capacity, the City of Charleston, and the City of
Charleston Police Department, Respondents.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE APPELLANT'S
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN
RECORD ON APPEAL

Taylor M. Smith IV
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Attorney for Appellant

Appellant hereby moves pursuant to Rule 263(b), SCACR, for a 30-day extension of the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The current COVID-19 pandemic and its attendant disruption of the ordinary functioning of business has disrupted Appellant's counsel's schedule and ordinary pace of work, affecting several matters, including the completion of the initial brief in this case.
2. On July 24, 2020, the undersigned counsel for Appellant received the transcript from the motion to reconsider hearing, partly at issue in this matter.
3. Appellant's brief and designation of matter are presently due today, August 24, 2020. If the request is granted, Appellant's initial brief and designation of matter to be included in the record on appeal will be due on September 23, 2020.
4. This is the first extension Appellant has requested in this appeal.
5. Respondent has consented to this proposed extension of time to serve the initial brief and designation of matter.
6. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Appellant prays for an order extending the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal by 30 days, to September 23, 2020.

Respectfully submitted,

/s/ Taylor Smith
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PROOF OF SERVICE

I certify that I have served the motion for an extension of time to serve and file Appellant's initial brief and designation of matter to be included in the record on appeal on counsel for Respondents, Christopher Dorsel, by emailing said documents to him at 12:52 p.m. on August 24, 2020, at the addresses noted below.

Christopher Thomas Dorsel, Esquire
chris@sennlegal.com

August 24, 2020

/s/ Taylor Smith
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