

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Alison Renee Lee, Circuit Court Judge

---

Appellate Case No. 2019-000566  
Case No. 2016-CP-40-0387

---

**RECEIVED**  
**Aug 20 2020**  
SC Court of Appeals

Sammie L. Goodwin, ..... Appellant,

v.

Richland County Sheriff Department, Richland County  
Sheriff Leon Lott in his official capacity, ..... Respondents.

---

**RETURN TO APPELLANT’S MOTION FOR EXTENSION  
TO FILE SUPPLEMENTAL RECORD ON APPEAL**

---

The Appellant Sammie L. Goodwin has filed a motion asking for an unspecified extension of time to file the Supplemental Record on Appeal as ordered by this Court in its Order filed July 9, 2020. That Order directed the Appellant to “serve and file a supplemental record on appeal that includes the thirteen matters listed in Respondents’ motion.” The Respondents have no objection to a reasonable extension.

In his motion, the Appellant claims that “the respondent has not made information available to the appellant.” The undersigned, however, has received no request from the Appellant for information nor any correspondence whatsoever. In fact, the Appellant has repeatedly failed to serve the Respondent’s counsel with filings or correspondence, including his current extension motion. The Respondent’s undersigned counsel only learned of the Appellant’s current motion because of the Court’s deficiency letter dated August 13, 2020.

At any rate, the Appellant has a list of the documents that were excluded from the Record on Appeal and must be included in the Supplemental Record on Appeal. That was included in the motion as referenced in the Court Order. The undersigned will send an additional copy with this return. With the exception of the transcripts, copies of the documents are available and can be downloaded from the Richland County Public Index. Nonetheless, the Appellant has never requested a copy of any documents from the undersigned counsel for the Respondent.

In sum, as indicated, the Respondents have no objection to a reasonable extension to allow for the Appellant to file the Supplemental Record for Appeal.

Respectfully submitted,

LINDEMANN, DAVIS & HUGHES P.A.

BY: s/ Andrew F. Lindemann  
ANDREW F. LINDEMANN #13030  
5 Calendar Court, Suite 202  
Post Office Box 6923  
Columbia, South Carolina 29260  
(803) 881-8920

-and-

ROBERT D. GARFIELD #6557  
CROWE LAFAYE, LLC  
500 Taylor Street, Suite 202  
Post Office Box 1149  
Columbia, South Carolina 29202  
(803) 724-5729

*Counsel for Respondents*

August 20, 2020

**RECEIVED**

**Aug 20 2020**

**SC Court of Appeals**

---

**CERTIFICATE OF SERVICE**

---

The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Respondents, does hereby certify that service of the **Return to Appellant's Motion for Extension to File Supplemental Record on Appeal** was made upon the *pro se* Appellant by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 20th day of August 2020, and upon all other counsel of record by email only pursuant to Section (g)(13) of the Supreme Court's Order Re: Operation of the Trial Courts During the Coronavirus Emergency (as amended May 29, 2020):

Mr. Sammie L. Goodwin  
312 Isaac Street  
Columbia, South Carolina 29203

**Via Email Only**

Robert D. Garfield, Esquire  
Crowe LaFave, LLC  
Email: [robert@crowelafave.com](mailto:robert@crowelafave.com)

s/ Andrew F. Lindemann



RECEIVED  
Aug 20 2020  
SC Court of Appeals

Telephone (803) 881-8920  
Facsimile (803) 862-1181

5 Calendar Court, Suite 202 (29206)  
Post Office Box 6923  
Columbia, South Carolina 29260

August 20, 2020

ANDREW F. LINDEMANN\*  
Direct Dial: (803) 881-8921  
Email: [andrew@ldh-law.com](mailto:andrew@ldh-law.com)

JAMES M. DAVIS, JR.†  
Direct Dial: (803) 881-8922  
Email: [jim@ldh-law.com](mailto:jim@ldh-law.com)

JOEL S. HUGHES†  
Direct Dial: (803) 881-8923  
Email: [joel@ldh-law.com](mailto:joel@ldh-law.com)

\*Also Admitted in North Carolina  
†Certified Mediator

*Of Counsel*

STEVEN R. SPREEUWERS  
Direct Dial: (803) 373-2268  
Email: [steve@ldh-law.com](mailto:steve@ldh-law.com)

**Via Email Only**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: Sammie L. Goodwin v. Richland County Sheriff Department, Richland County Sheriff  
Leon Lott in his official capacity  
Appellate Case Number: 2019-000566  
Civil Action Number: 2016-CP-40-0387  
Claim Number: Risk Management  
Our File Number: 314.20152

Dear Ms. Kitchings:

Pursuant to Section (c)(6) of the Supreme Court's Amended Order Re: Operation of the Appellate Courts During the Coronavirus Emergency (As Amended May 29, 2020), please find enclosed for filing the **Return to Appellant's Motion for Extension to File Amended Record on Appeal** in the above referenced matter. By copy of this letter, I am serving copies on the *pro se* Appellant and all other counsel of record.

If you have any questions, please advise. Thank you for your assistance in this matter.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.

Andrew F. Lindemann

AFL/jmb  
Enclosure

The Honorable Jenny Abbott Kitchings  
August 20, 2020  
Page Two

---

cc: (w/ Enclosure)

Mr. Sammie L. Goodwin  
321 Isaac Street  
Columbia, South Carolina 29203

**Via Email Only**

Robert D. Garfield, Esquire  
Crowe LaFave, LLC  
Email: [robert@crowelafave.com](mailto:robert@crowelafave.com)