

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM THE ADMINISTRATIVE LAW COURT
H.W. Funderburk, Jr., Administrative Law Judge**

Case No.: 20-ALJ-22-0070-AP

Appellate Case No. 2020-000981

South Carolina Department of Employment and
Workforce and Sykes Enterprises, Inc.,

Respondents,

v.

Robert M. Ardis,

Appellant.

RECEIVED
Sep 14 2020
SC Court of Appeals

**MOTION FOR EXTENSION OF TIME TO FILE RETURN TO APPELLANT'S
MOTION TO STRIKE AND FOR SANCTIONS**

Pursuant to Rule 263(b), SCACR, Respondent South Carolina Department of Employment and Workforce (the Department) submits this motion to the Court requesting a twenty-day extension of time to file a Return to Appellant's Motion to Strike and for Sanctions. Currently, the Department's Return is due September 14, 2020. This is the Department's first request for an extension. The Department also requests the time limit for its Return be held in abeyance pending the Court's decision on this motion.

The Department requests this extension because Appellant's motion, with appendices, is well over 100 pages, and the Department reasonably requires additional time to fully review

Appellant's motion and properly respond. Also, the Department's workload has greatly increased due to the unprecedented events surrounding the COVID-19 public health crisis. The Department believes the additional time will not prejudice either party or cause undue delay, especially considering that Appellant is still attempting to cure multiple deficiencies the Court has discovered with his filings. Thus, the Department respectfully requests the Court enter an order extending the deadline for its Return from September 14, 2020, to October 5, 2020, as good cause exists for an extension.

Respectfully Submitted,

s/ Steven A. Jordan, Jr.

Steven A. Jordan, Jr. (SC Bar # 100314)
SC Department of Employment and Workforce
Post Office Box 8597
Columbia, SC 29202
803.737.0395 (phone)
803.737.0124 (fax)
Legal@dew.sc.gov

**Attorney for Respondent SC Department of
Employment and Workforce**

September 11, 2020

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Appellant.

PROOF OF SERVICE

I certify that I have served the Respondent DEW's Motion for Extension of Time to File Return to Appellant's Motion to Strike and For Sanctions on the parties in this case by depositing a copy of it in the United States Mail, postage prepaid, and by email on September 11, 2020, addressed to the parties at their addresses of record:

Robert M. Ardis
105 North Guignard Dr
Sumter SC 29150
Michael.ardis@gmail.com

Sykes Enterprises Inc.
PO Box 16560
Clearwater, FL 33766

September 11, 2020



Kristi Chesley
South Carolina Department of Employment and
Workforce
Post Office Box 8597
Columbia, South Carolina 29202
(803) 737-0395

P.O. Box 8597
1550 Gadsden Street
Columbia, SC 29202
dew.sc.gov



Henry McMaster
Governor

G. Daniel Ellzey
Executive Director

P.O. Box 8597
Columbia, South Carolina 29202
(803) 737-0395
FAX (803) 737-0124
September 11, 2020

VIA EMAIL AND US MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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Sep 14 2020
SC Court of Appeals

RE: South Carolina Department of Employment and Workforce v.
Robert M. Ardis
Appellate Case No: 2020-000981

Dear Ms. Kitchings:

Enclosed is the original of the Respondent DEW's Motion for Extension of Time to File Return to Appellant's Motion to Strike and For Sanctions in the above referenced case. A Proof of Service is also included in this packet.

Please let me know if you have any questions.

Sincerely,

Kristi Chesley
Administrative Legal Assistant for
Steven Jordan
Attorney for Respondent South Carolina
Department of Employment and Workforce