

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Jocelyn Newman, Circuit Court Judge

Appellate Case No. 2020-000589
Case No. 2017-CP-40-3166

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Oct 05 2020
SC Court of Appeals

Bridgett Taylor,..... Respondent,

v.

Richland County Sheriff's Department, Appellant.

**MOTION FOR EXTENSION TO
FILE INITIAL REPLY BRIEF OF APPELLANT**

The Appellant Richland County Sheriff's Department respectfully moves this Court for an additional extension of time through October 9, 2020, by which to file and serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellant's motion is based on the following grounds:

1. The Appellant's Initial Reply Brief is currently due to be filed and served on October 5, 2020.

2. The undersigned counsel for the Appellant requires this additional time to complete the preparation and drafting of the Appellant's Initial Reply Brief because a family-related emergency medical issue involving a close relative. Additionally, the undersigned counsel has another appellate court brief due on the same date in the Fourth Circuit Court of Appeals.

3. This motion is being filed without prior consultation with opposing counsel; however, it is anticipated that there will be no objection because the Respondent's counsel received without objection two extensions for the filing of the Initial Brief of Respondent.

WHEREFORE, the Appellant Richland County Sheriff's Department respectfully requests that it be allowed until October 9, 2020, by which to file and serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN & DAVIS, P.A.

BY: s/ Andrew F. Lindemann

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Post Office Box 6923
Columbia, South Carolina 29260
(803) 881-8920

Counsel for Appellant

October 5, 2020

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CERTIFICATE OF SERVICE

Pursuant to Section (g)(3) of the Supreme Court's Order Re: Operation of the Trial Courts During the Coronavirus Emergency (As Amended May 29, 2020), the undersigned employee of Lindemann & Davis, P.A., counsel for the Appellant, does hereby certify that service of the **Motion for Extension to File Initial Reply Brief of Appellant** was made upon all counsel of record by email only this the 5th day of October 2020:

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s/ Andrew F. Lindemann



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October 5, 2020

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Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

RE: Bridgett Taylor v. Richland County Sheriff's Department
Appellate Case Number: 2020-000589
Civil Action Number: 2017-CP-40-3166
Claim Number: Risk Management
Our File Number: 314.20297

Dear Ms. Kitchings:

Pursuant to Section (c)(6) of the Supreme Court's Order RE: Operation of the Appellate Courts During the Coronavirus Emergency Appellate Case No. 2020-000447 (As Amended May 29, 2020), please find enclosed for filing by email only the **Motion for Extension to File Initial Reply Brief of Appellant** in the above referenced matter. By copy of this letter, I am serving copies on all counsel of record by email only pursuant to Section (g)(3) of this same order. Finally, no filing fee will be sent to the Court pursuant to Section (l)(1) of the order.

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

cc: Andrew W. Kunz, Esquire (w/ Enclosure)
Lauren K. Slocum, Esquire (w/ Enclosure)
Robert D. Garfield, Esquire (w/ Enclosure)

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