

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BARNWELL COUNTY
In the Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge
Clifton B. Newman, Circuit Court Judge

Lower Court Case No. 2013-CP-06-0059
Appellate Case No. 2019-000599

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Nov 12 2020
SC Court of Appeals

Lorena Robinson, Elaine Nix, Archie Patterson,
and Tami Bollerman, Plaintiffs,

Of Whom Archie Patterson and Tami Bollerman are the Respondents/Appellants,

v.

South Carolina Department of Employment and
Workforce Appellant/Respondent.

**JOINT CONSENT REQUEST FOR AN EXTENSION OF THE
DEADLINE FOR FILING INITIAL BRIEFS ON CROSS-APPEAL**

Pursuant to Rule 263(b), SCACR, Appellant–Respondent South Carolina Department of Employment and Workforce (DEW), as well as Respondents–Appellants Archie Patterson and Tami Bollerman, by and through their undersigned attorneys, respectfully submit this joint request for a 30-day extension of the November 25, 2020 deadline by which Appellant–Respondent and Respondents–Appellants must file Initial Briefs and Designation of Matter in this cross-appeal.

The basis for this request is that the parties’ counsel require additional time to research and properly prepare the briefs in this cross-appeal from an order certifying a class in this matter. Indeed, the undersigned counsel for DEW was just recently retained for the appeal. With this

modest extension, the brief would be due on December 28, 2020 given that the 30-day extension would fall on Friday, December 25, 2020, which is Christmas Day. See Rule 263(a), SCACR (providing “[t]he last day of the period so computed is to be included, unless it is a Saturday, Sunday or a state or federal holiday, in which event the period runs until the end of the next day which is neither a Saturday, Sunday nor such holiday”). This is the parties’ first request for an extension of the initial briefing deadline.

Accordingly, counsel for Appellant–Respondent and Respondents–Appellants respectfully request that the Court grant their joint consent motion for a 30-day extension to file their respective Initial Briefs and Designation of Matter for good cause shown and in the interests of justice.

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Barnwell, South Carolina
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South Carolina Department of Employment and
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PROOF OF SERVICE

I certify that I have served the parties' Joint Consent Motion for Extension of the Deadline for Filing Initial Briefs on Cross-Appeal on the following counsel of record by email on November 12, 2020.

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November 12, 2020

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Subject: Patterson v. SCDEW (App. No. 2019-000599) Joint Consent Request for Extension of Initial Briefing Deadline
Date: Thursday, November 12, 2020 1:16:50 PM
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[image008.png](#)
[Patterson v. SCDEW \(App. No. 2019-000599\) Joint Consent Motion for Extension of Initial Briefing Deadline\(37178889.1\).pdf](#)
[Patterson v. SCDEW \(App. No. 2019-0005999\) Proof of Service for Joint Consent Extension Request\(37178884.1\).pdf](#)

All,

Pursuant to [In re Operation of the Appellate Courts During the Coronavirus Emergency](#), App. No. 2020-000447, Am. Order No. 2020-05-29-02, ¶ (g)(3) (S.C. Sup. Ct. filed May 29, 2020), attached for service upon you via email is the parties' Joint Consent Motion for Extension of Initial Briefing Deadline, as well as a Proof of Service, being filed in the Court of Appeals this afternoon.

Should you have any questions or concerns, please don't hesitate to contact us. Thanks and have a great afternoon.

Best,

Lisle



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