

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Charles B. Simmons, Jr., Master In Equity

Appellate Case No. 2020-001188

**RECEIVED**  
**Nov 17 2020**  
**SC Court of Appeals**

Richard Joseph Rogozinski.....Respondent,

v.

County of Greenville and City of Simpsonville ..... Appellants

**MOTION FOR EXTENSION OF TIME TO FILE  
APPELLANTS' INITIAL BRIEF AND DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

The City of Simpsonville (hereinafter “Appellant”) hereby moves the Court for an extension of thirty days in which to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal. The reason for this request is that Counsel for the City has had other obligations and deadlines to meet. Currently the City must file these papers on or before November 19, 2020 as the transcript of record was received from the court reporter on October 20, 2020.

Counsel for the City has consulted with the other counsel of record concerning this Motion and counsel has consented to same

Greenville, South Carolina  
November 17, 2020

*s/David W. Holmes*  
David W. Holmes  
SC Bar Number: 2577  
HOLMES LAW FIRM  
712 North Main Street  
Greenville, SC 29609  
Telephone: (864) 271-2381

Other Counsel of Record:

Clayton L. Jennings  
S.C. Bar # 68284  
1151 E. Washington St.  
Greenville, South Carolina 29601  
(864) 239-0055  
Attorney for Respondent

Boyd B. Nicholson, Jr.  
S.C. Bar No. 65387  
Post Office Box 2048 Greenville, SC  
29602  
(864) 240-3247  
Attorney for County of Greenville

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

**Nov 17 2020**

**SC Court of Appeals**

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Charles B. Simmons, Jr., Master In Equity

Case No. 2020-001188

Richard Joseph Rogozinski.....Respondent,

v.

County of Greenville and City of Simpsonville ..... Appellants

PROOF OF SERVICE

I certify that the Motion for Extension of Time was served on Clayton L. Jennings, Attorney for Respondent, and Boyd B. Nicholson, Jr., Attorney for the County of Greenville by e-mail as follows: Clayton L. Jennings addressed to clayton@jenningslawfirm.com and Boyd B. Nicholson, Jr. addressed to nnicholson@hsblawfirm.com on November 17, 2020.

November 17, 2020

s/ David W. Holmes  
David W. Holmes  
SC Bar Number: 002577  
HOLMES LAW FIRM  
712 North Main Street  
Greenville, SC 29609  
Telephone: (864) 271-2381

HOLMES LAW FIRM  
712 NORTH MAIN STREET  
GREENVILLE, SOUTH CAROLINA 29609

DAVID W. HOLMES  
Writer's email: davidholmes@holmes-law.com

Tel. 864.271.2381  
Fax. 864.751.9484

November 17, 2020

*Via Electronic Filing*

V. Claire Allen  
Chief Deputy Clerk  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

**RECEIVED**  
**Nov 17 2020**  
**SC Court of Appeals**

**RE: Richard Rogozinski v. CountyCity of Simpsonville**  
**Appellate Case No. 2020-001188**

Ms. Allen:

Please find enclosed for filing a Motion for Extension of Time to File Appellants' Initial Brief and Designation of Matter to be Included in the Record on Appeal and Proof of Service in connection with the above-referenced matter. By separate letter, I am sending our filing fee check in the amount of \$25.00.

By copy of this letter, I am serving a copy of these documents upon Clayton L. Jennings., counsel for the Respondent and Boyd B. Nicholson, Jr., counsel for Greenville County.

Sincerely,

HOLMES LAW FIRM

s/David W. Holmes  
David W. Holmes

DWH/me

cc: Clayton L. Jennings via email only  
Boyd B. Nicholson, Jr., via email only