

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Bentley D. Price

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Appellate Case No. 2020-000936

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**RECEIVED**

**Nov 18 2020**

**SC Court of Appeals**

Skip Hoagland, ..... Appellant,

v.

John Tecklenburg, in his official capacity, the City of Charleston, and the City of  
Charleston Police Department, ..... Respondents.

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**MOTION FOR EXTENSION OF TIME TO SERVE AND FILE  
RESPONDENTS' REPLY BRIEF AND DESIGNATIONS OF MATTER TO  
BE INCLUDED IN RECORD ON APPEAL**

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Respondents hereby move pursuant to Rule 240 and 263(b), SCACR, requesting that the Court allow a thirty (30) day extension to file and serve Respondents' reply brief and designations of matter to be included in the record on appeal. Respondents respectfully request that the thirty (30) day extension be granted from the date Respondents' reply brief and designations of matter to be included in the record on appeal was previously due. The grounds for this motion are that there is good cause to grant the requested extension, as follows:

1. Respondents were served with Appellant's Initial Brief and Designation of Matter on October 23, 2020.
2. Respondents' reply brief and designation of matter are due for filing and service on November 23, 2020.
3. Since the service of Appellant's Initial Brief, the undersigned counsel for Respondents has had a case placed on the non-jury trial roster for the first week of December. In addition to trial preparation, the undersigned has had an inordinate number of federal court briefs, responses, and objections due in a short time frame. Due to trial preparation and other legal commitments, the undersigned has not had proper time to prepare a reply brief.
4. Respondents' reply brief and designations of matter are due Monday, November 23, 2020. If the request is granted, Respondents' reply brief and designations of matter to be included in the record on appeal will be due on Wednesday, December 23, 2020, thirty (30) days from the original due date.
5. This is the first extension Respondents have requested in this appeal.

6. The undersigned has consulted with counsel for Appellant who has consented to this proposed extension of time to serve Respondents' reply brief and designation of matter.
7. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Respondents pray for an order extending the time in which to serve and file the Respondents' reply brief and designations of matter to be included in the record on appeal up to including thirty (30) days, to December 23, 2020.

Respectfully submitted,

*s/Christopher T. Dorsel*  
Christopher T. Dorsel, Esquire  
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November 18, 2020

Charleston, South Carolina

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**PROOF OF SERVICE**

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I certify that the motion for an extension of time to serve and file Respondents' reply brief and designations of matter to be included in the record on appeal along with this proof of service has been served on counsel for Appellant, Taylor M. Smith, IV, by emailing said documents to him on November 18, 2020, at the email address noted below.

Taylor M. Smith IV, Esquire  
S.C. Bar No. 101584  
Harrison, Radeker & Smith, P.A.  
Post Office Box 50143  
Columbia, SC 29250  
Email: [Taylor@harrisonfirm.com](mailto:Taylor@harrisonfirm.com)

*Attorney for Appellant*

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**SC Court of Appeals**

s/Christopher T. Dorsel  
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*Attorney for Respondents*

November 18, 2020

Charleston, South Carolina