

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Dec 17 2020

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Charles B. Simmons, Jr., Master-in-Equity

C.A. No.: 2018-CP-23-05191
Appellate Case No. 2020-001188

Richard Joseph Rogozinski, Respondent,

v.

County of Greenville and City of SimpsonvilleAppellants

**CONSENT MOTION FOR EXTENSION OF TIME FOR APPELLANT CITY OF
SIMPSONVILLE TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to the Court’s order filed on November 19, 2020, Appellant City of Simpsonville’s initial brief and designation of matter to be included in the record on appeal are due on December 21, 2020. Pursuant to Rule 263(b), SCACR, Appellant City of Simpsonville respectfully moves for a thirty-day extension of time in which to file these materials, making them due on January 20, 2021. Counsel seeks this extension due to a family member who was hospitalized because of COVID-19 as well as current workload obligations. Counsel for Respondent has graciously consented to this request. Appellant City of Simpsonville understands that Greenville County also seeks an extension, to which Appellant City of Simpsonville consents. In the meantime, Appellant City of Simpsonville asks that current filing deadlines be stayed

pending resolution of this motion.

Respectfully Submitted,

s/ David W. Holmes

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Attorney for Appellant City of Simpsonville

December 17, 2020
Greenville, South Carolina

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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 December 17, 2020.

December 17, 2020

s/ David W. Holmes
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SC Court of Appeals

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December 17, 2020

VIA EMAIL ONLY: ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

Re: *Richard Joseph Rogozinski v. County of Greenville and City of Simpsonville*
Appellate Case # 2020-001188
C.A. No. 2018-CP-23-05191

Dear Ms. Kitchings:

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, together with a Proof of Service for the same. I have not included a filing fee consistent with the Supreme Court of South Carolina's Amended Order dated May 29, 2020.

Please let me know if you have any questions. I appreciate your assistance in this regard.

Sincerely,

HOLMES LAW FIRM



David W. Holmes

Enclosure (as noted)

cc: Clayton L. Jennings, Esq. (Via email only: clayton@jenningslawfirm.com)
Boyd B. Nicholson, Jr., Esq. (Via email only: nnicholson@hsblawfirm.com)