

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Dec 17 2020

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

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 Simpsonville,

OF WHOM

City of Simpsonville isAppellant,

and

County of Greenville is Additional Appellant.

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

As established by the Court's order filed on November 19, 2020, Appellant Greenville County's initial brief and designation of matter to be included in the record on appeal are currently due on December 21, 2020. Pursuant to Rule 263(b), SCACR, Appellant Greenville County 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 current workload obligations and staffing concerns during the upcoming holidays. Counsel for Respondent has graciously consented

to this request, and Appellant Greenville County understands that Appellant City of Simpsonville also seeks an extension, to which Appellant Greenville County consents. In the meantime, Appellant Greenville County asks that current filing deadlines be stayed pending resolution of this motion.

Respectfully Submitted,

HAYNSWORTH SINKLER BOYD, P.A.



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December 17, 2020
Greenville, South Carolina

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PROOF OF SERVICE

I certify that I have served *Consent Motion for Extension of Time to File Appellant Greenville County's Initial Brief and Designation of Matter to be Included in the Record on Appeal* on all attorneys of record by depositing a copy of the same in the United States

Mail, postage prepaid, on December 17, 2020, addressed to:

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December 17, 2020
Greenville, South Carolina

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December 17, 2020

VIA U.S. MAIL AND EMAIL (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
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Dec 17 2020
SC Court of Appeals

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

Dear Ms. Kitchings:

This firm represents Greenville County, one of the Appellants in the above matter. Enclosed for filing, please find an original and seven copies of the *Consent Motion for Extension of Time to File Appellant Greenville County's Initial Brief and Designation of Matter to be Included in the Record on Appeal*, together with our Proof of Service for the same. We have not included a filing fee consistent with the Supreme Court of South Carolina's Amended Order dated May 29, 2020.

If you have any questions, please give me a call. Thank you for your assistance in this matter. Please note service on counsel of record by copy of this letter. In the meantime, we ask that the current filing deadline be stayed pending resolution of this request.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



Boyd B. Nicholson, Jr.

Enclosures

cc: Clayton L. Jennings, Esq. (Via U.S. Mail and email to clayton@jenningslawfirm.com)
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