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Dec 22 2020

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Benjamin Culbertson, Circuit Court Judge

Case No. 2017-CP-26-05913
(Appellant Case No. 2019-001556)

John Kennedy ,Appellant,

v.

Myrtle Beach Police Department
Amy Prock, Angela Kegler, and
John Pedersen,Respondents.

**JOINT MOTION TO CORRECT RECORD ON APPEAL
AND TO EXTEND TIME FOR FILING FINAL BRIEFS**

The parties hereby move for permission to correct the Record on Appeal and to extend the time to their final briefs. The motion is based on the following grounds:

1. The Record on Appeal previously filed with the court by Appellant Counsel's former associate failed to include two items designated by Respondent, specifically the Complaint and Answer in the underlying action.
2. The Record on Appeal previously filed with the court also contains handwritten page numbers which must be corrected.
3. The departure of Appellant Counsel's former associate from Appellant Counsel's practice necessitates additional time to correct the Record on Appeal.

4. The parties cannot file their final briefs until they are in possession of the corrected Record on Appeal.

Based on the foregoing, the parties jointly request that Appellant be allowed until January 15, 2021, to file a corrected Record on Appeal with the missing items and proper pagination. The parties further jointly request that they be allowed until January 31, 2021, to file their final briefs.

Respectfully submitted,

s/Donald Gist
Donald Gist
Imani Newborn
GIST LAW FIRM, PA
4400 North Main Street
Columbia, SC 29203
(803) 771-8007

Attorneys for Appellant

s/Derwood Aydlette, III
Derwood L. Aydlette III
T. Foster Haselden
GIGNILLIAT, SAVITZ & BETTIS, L.L.P.
900 Elmwood Avenue, Suite 100
Columbia, South Carolina 29201
(803) 799-9311

Attorneys for Respondents

December 22, 2020

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PROOF OF SERVICE

I certify that on this 22nd day of December, 2020, I electronically filed the foregoing **Joint Motion to Correct Record on Appeal and to Extend Time for Filing Final Briefs** with the South Carolina Court of Appeals via email, and I also sent a check in the amount of \$50.00 to the South Carolina Court of Appeals via First Class U.S. Mail, to cover the applicable filing fee. I further certify that I served a copy of the foregoing **Joint Motion** via email on the following counsel of record for the Respondents:

**Derwood Aydlette, III
T. Foster Haselden
Gignilliat, Savitz & Bettis, L.L.P.
900 Elmwood Avenue, Suite 100
Columbia, SC 29201
daydlette@gsblaw.net
(803) 799-9311**

s/Imani Newborn
Attorney for Appellant