

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BARNWELL COUNTY  
In the Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge  
Clifton B. Newman, Circuit Court Judge

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Lower Court Case No. 2013-CP-06-0059  
Appellate Case No. 2019-000599

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**Dec 17 2020**

**SC Court of Appeals**

Lorena Robinson, Elaine Nix, Archie Patterson,  
and Tami Bollerman, ..... Plaintiffs,

Of Whom Archie Patterson and Tami Bollerman are the Respondents/Appellants,

v.

South Carolina Department of Employment and  
Workforce ..... Appellant/Respondent.

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**JOINT CONSENT REQUEST FOR A SECOND EXTENSION OF  
THE DEADLINE FOR FILING INITIAL BRIEFS ON CROSS-APPEAL**

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Pursuant to Rule 263(b), SCACR, Appellant–Respondent South Carolina Department of Employment and Workforce (DEW), as well as Respondents–Appellants Archie Patterson and Tami Bollerman, by and through their undersigned attorneys, respectfully submit this joint request for a 30-day extension of the current January 4, 2021 deadline by which Appellant–Respondent and Respondents–Appellants must file Initial Briefs and Designation of Matter in this cross-appeal.

The basis for this request is that the parties’ counsel require additional time to research and properly prepare the briefs in this cross-appeal from an order certifying a class in this matter. Although the parties received an initial extension from the Court, unfortunately, much of the

additional time provided coincides with the holidays and previously scheduled vacation. The parties therefore beg the Court's indulgence in this request for additional time. With this modest extension, the brief would be due on February 3, 2021. This is the parties' second request for an extension of the initial briefing deadline.

Accordingly, counsel for Appellant–Respondent and Respondents–Appellants respectfully request that the Court grant their joint consent motion for a second 30-day extension to file their respective Initial Briefs and Designation of Matter in this cross-appeal for good cause shown and in the interests of justice.

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Barnwell, South Carolina  
December 17, 2020

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**PROOF OF SERVICE**

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I certify that I have served the parties' Joint Consent Motion for a Second Extension of the Deadline for Filing Initial Briefs on Cross-Appeal on the following counsel of record by email on December 17, 2020.

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December 17, 2020

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**Subject:** Patterson v. SCDEW (App. No. 2019-000599) Joint Consent Request for Second Extension of Initial Briefing Deadline  
**Date:** Thursday, December 17, 2020 4:37:07 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[Patterson v. SCDEW \(App. No. 2019-000599\) Joint Consent Motion for Second Extension of Initial Briefing Deadline\(37232590.1\).pdf](#)  
[Patterson v. SCDEW \(App. No. 2019-000599\) Proof of Service for Second Joint Consent Extension Request\(37232578.1\).pdf](#)

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All,

Pursuant to [In re Operation of the Appellate Courts During the Coronavirus Emergency](#), App. No. 2020-000447, Am. Order No. 2020-05-29-02, ¶ (g)(3) (S.C. Sup. Ct. filed May 29, 2020), attached for service upon you via email is the parties' Joint Consent Motion for a Second Extension of the Initial Briefing Deadline, as well as a Proof of Service, being filed in the Court of Appeals this afternoon.

Should you have any questions or concerns, please don't hesitate to contact us. I hope everyone enjoys the holidays. Thanks and have a great afternoon.

Best,

Lisle



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