

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Alison Renee Lee, Circuit Court Judge

Appellate Case No. 2020-00719
Case No. 2015-CP-40-0619

RECEIVED
Jan 06 2021
SC Court of Appeals

Nancy Morris, as Personal Representative of the
Estate of David Allan Woods, Appellant,

v.

State Fiscal Accountability Authority, South Carolina
Insurance Reserve Fund, Andrew J. Bland, Richard T. Burkholder,
Leemon E. Carner, Priscilla Bland, Jerry Speissegger, Jr., Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF OF RESPONDENTS STATE FISCAL
ACCOUNTABILITY AUTHORITY AND SOUTH CAROLINA
INSURANCE RESERVE FUND**

The Respondents State Fiscal Accountability Authority and South Carolina Insurance Reserve Fund (“Respondents”) respectfully move this Court for an additional extension of time until January 25, 2021, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

The Respondents' motion is based on the following grounds:

1. The Respondents' Initial Brief is currently due to be filed and served on January 8, 2021.

2. The undersigned counsel requires additional time to complete the Respondents' Initial Brief because the undersigned counsel has had numerous other deadlines that prevented him from completing the Respondents' Initial Brief by the current deadline, including another appellate brief due on that same date (January 8, 2021) and an additional brief due on January 15, 2021.

3. The undersigned has consulted with Thomas Rode and Garrett Johnson, counsel for the Appellant, and they consented to the requested extension by email (copy attached).

WHEREFORE, the Respondents State Fiscal Accountability Authority and South Carolina Insurance Reserve Fund respectfully request that they be allowed until January 25, 2021, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN & DAVIS, P.A.

BY: s/ Andrew F. Lindemann

ANDREW F. LINDEMANN #13030

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Email: andrew@ldlawsc.com

*Counsel for Respondents State Fiscal
Accountability Authority and South Carolina
Insurance Reserve Fund*

January 6, 2021

From: Thomas Rode <thomas@tktlawyers.com>
Sent: Tuesday, January 5, 2021 5:51 PM
To: Andrew Lindemann <Andrew@ldlawsc.com>
Cc: Garrett Johnson <gjohnson@elrodpope.com>
Subject: Re: Morris v. SFAA appeal

We've all been there. I consent.
Good luck.

Sent from iPhone.



Thomas Rode
Attorney
Thurmond Kirchner & Timbes, P.A.
?
P: [\(843\) 937-8000](tel:(843)937-8000) | F: [\(843\) 937-4200](tel:(843)937-4200)
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From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Tuesday, January 5, 2021 5:49:51 PM
To: Thomas Rode <thomas@tktlawyers.com>
Cc: Garrett Johnson <gjohnson@elrodpope.com>
Subject: Morris v. SFAA appeal

Thomas and Garrett:

I have a favor to ask. My Initial Brief is due this Friday. I am just swamped to start the year. I have another appellate brief due the same day as well as one due on the 15th. I am going to ask the Court for an additional extension through Monday, January 25th. Will you kindly consent to that extension? I would appreciate the courtesy.

Thanks.

Andrew

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SC Court of Appeals

CERTIFICATE OF SERVICE

Pursuant to Section (g)(3) of the Supreme Court's Order re: Operation of the Trial Courts During the Coronavirus Emergency (As Amended May 29, 2020), the undersigned employee of Lindemann & Davis, P.A., counsel for the Respondents State Fiscal Accountability Authority and South Carolina Insurance Reserve Fund, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Respondents State Fiscal Accountability Authority and South Carolina Insurance Reserve Fund** was made upon all counsel of record by email only at the below listed email addresses this the 6th day of January 2021:

Thomas J. Rode, Esquire
Thurmond Kirchner & Timbes, P.A.
Email: thomas@tktlawyers.com

Garrett B. Johnson, Esquire
Email: gjohnson@elrodpope.com

s/ Andrew F. Lindemann



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*Also Admitted in North Carolina
†Certified Mediator

Of Counsel

STEVEN R. SPREEUWERS
Direct Dial: (803) 373-2268
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January 6, 2021

Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

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Jan 06 2021

SC Court of Appeals

RE: Nancy Morris, as Personal Representative of the Estate of David Allan Woods v. State Fiscal Accountability Authority, South Carolina Insurance Reserve Fund, Andrew J. Bland, Richard T. Burkholder, Leemon E. Carner, Priscilla Bland, Jerry Speissegger, Jr.
Appellate Case Number: 2020-00719
Civil Action Number: 2015-CP-40-0619
Claim Number: B5578
Our File Number: 104.9622

Dear Ms. Kitchings:

Pursuant to Section (c)(6) of the Supreme Court's Amended Order Re: Operation of the Appellate Courts During the Coronavirus Emergency (As Amended May 29, 2020), please find enclosed for filing by email only the **Motion for Extension of Time to File Initial Brief of Respondents State Fiscal Accountability Authority and South Carolina Insurance Reserve Fund** in the above referenced matter. By copy of this letter, I am serving copies on all counsel of record by email only.

Thank you for your assistance in this matter. If you have any questions, please advise.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosure

cc: Thomas J. Rode, Esquire (w/ Enclosure, Via Email Only)
Andrew W. Creech, Esquire (w/ Enclosure, Via Email Only)
Harold C. Staley, Esquire (w/ Enclosure, Via Email Only)
Garrett B. Johnson, Esquire (w/ Enclosure, Via Email Only)