

RECEIVED

Feb 25 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT
Ralph K. Anderson, III, Administrative Law Court Judge

Appellate Case No. 2020-001689
Case No. 2020ALJ300064AP

South Carolina Technical College System, Appellant,

v.

Carla Jackson and South Carolina
Department of Administration, Respondents,

Of Whom, Carla Jackson is the..... Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF OF APPELLANT**

The Appellant South Carolina Technical College System respectfully moves this Court for an additional extension of time until March 22, 2021, by which to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellant's motion is based on the following grounds:

1. The Appellant's Initial Brief is currently due to be filed and served on March 1, 2021.

2. The undersigned counsel requires additional time to complete the Appellant's Initial Brief because the undersigned counsel had an unexpected death in his immediate family on February 20, 2022, and will be out of town dealing with family arrangements and related matters.

3. The undersigned has consulted with Shannon Polvi, counsel for the Respondent, and she consented to the requested extension by email (copy attached).

WHEREFORE, the Appellant South Carolina Technical College System respectfully requests that it be allowed until March 22, 2021, by which to file and serve its 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
5 Calendar Court, Suite 202
Post Office Box 6923
Columbia, South Carolina 29260
(803) 881-8920
Email: andrew@ldlawsc.com

*Counsel for Appellant
South Carolina Technical College System*

February 25, 2021

From: [Shannon Polvi](#)
To: [Andrew Lindemann](#)
Cc: "[Warren V. Ganjehsani, Esquire](#)"
Subject: RE: SCTCS v Jackson Appeal -- Case No. 2020-001689
Date: Wednesday, February 24, 2021 4:22:18 PM

Dear Andrew,

My condolences on the loss of your mother. The loss itself is very painful and then with a passing of a loved one comes the logistical burdens of funeral arrangements and estate matters.

You have my consent to the extension.

Sincerely,
Shannon

Shannon Polvi
CROMER BABB PORTER & HICKS, LLC

1418 Laurel St., Suite A (29201) | P.O. Box 11675 | Columbia, SC 29211
Phone 803.799.9530 | Fax 803.799.9533
shannon@cbphlaw.com
www.cbphlaw.com

This electronic mail may be attorney/client privileged and may contain confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copy of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone (803) 799-9530 and delete the message immediately. Thank you.

From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Wednesday, February 24, 2021 4:03 PM
To: Shannon Polvi <Shannon@CBPHlaw.com>
Cc: 'Warren V. Ganjehsani, Esquire' <warrenganjehsani@scdps.net>
Subject: SCTCS v Jackson Appeal -- Case No. 2020-001689
Importance: High

Shannon:

I hope you are doing well. I have a big favor to ask.

My initial brief for SCTCS is due this coming Monday on March 1, 2021. I will need to ask the Court for some additional time. I plan to ask for 21 days because of other deadlines in early March. I

unexpectedly lost my mother this past weekend and have had to deal with not just the grief but everything else that goes along with that this week since I am also the PR of her estate. In addition, this month was already a challenge since both of our paralegals have been out most of February due to COVID. I would definitely appreciate the courtesy of your consent to the additional time. I plan to get a motion filed in the morning if possible. So please let me know.

Thanks.

Andrew

Andrew F. Lindemann
Lindemann & Davis, P.A.
5 Calendar Court, Suite 202
Post Office Box 6923
Columbia, South Carolina 29260
Direct Dial: 803-881-8921
Email: andrew@ldlawsc.com

RECEIVED

Feb 25 2021

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 Appellant, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Appellant** was made upon all counsel of record by email only this the 25th day of February 2021:

Shannon M. Polvi, Esquire
Cromer Babb Porter & Hicks, LLC
Email: shannon@cbphlaw.com

Warren V. Ganjehsani, Esquire
Chief Legal Counsel
South Carolina Technical College System
Email: ganjehsani@sctechsystem.edu

s/ Andrew F. Lindemann



Telephone (803) 881-8920
Facsimile (803) 862-1181

5 Calendar Court, Suite 202 (29206)
Post Office Box 6923
Columbia, South Carolina 29260

ANDREW F. LINDEMANN*
Direct Dial: (803) 881-8921
Email: andrew@ldlawsc.com

JAMES M. DAVIS, JR.†
Direct Dial: (803) 881-8922
Email: jim@ldlawsc.com

*Also Admitted in North Carolina
†Certified Mediator

Of Counsel

STEVEN R. SPREEUWERS
Direct Dial: (803) 373-2268
Email: steve@ldlawsc.com

February 25, 2021

Via Email Only

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

RE: South Carolina Technical College System v. Carla Jackson
Appellate Case Number: 2020-001689
ALC Number: 20-ALJ-30-0064-AP
Our File Number: 79.20391

RECEIVED
Feb 25 2021
SC Court of Appeals

Dear Ms. Kitchings:

In accordance with Section (c)(5) of the Supreme Court's Order RE: Operation of the Appellate Courts During the Coronavirus Emergency (As Amended May 29, 2020), please find enclosed for filing my **Motion for Extension of Time to File Initial Brief of Appellant** in the above referenced matter. In accordance with Section (g)(3) of this same order, I am hereby serving copies on all counsel of record by email only. If you have any questions, please advise.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosure

cc: Shannon M. Polvi, Esquire (w/ Enclosure, Via Email Only)
Warren V. Ganjehsani, Esquire (w/ Enclosure, Via Email Only)