

**RECEIVED**  
**Mar 25 2021**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The 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 is .....Appellant,

and

County of Greenville is ..... Additional Appellant.

**JOINT CONSENT MOTION FOR EXTENSION OF TIME FOR  
APPELLANTS COUNTY OF GREENVILLE AND CITY OF  
SIMPSONVILLE TO FILE REPLY BRIEFS**

Pursuant to Rule 208(a), SCACR, Appellants’ reply briefs are currently due on March 29, 2021. Pursuant to Rule 263(b), SCACR, Appellants County of Greenville and City of Simpsonville respectfully move for a ten-day extension of time in which to file these materials, making them due on April 8, 2021. Counsel seeks this extension due to current workload obligations and staffing concerns. Counsel for Respondent has graciously consented to this request. In the meantime, Appellants County of Greenville and City of Simpsonville ask that

current filing deadlines be stayed pending resolution of this motion.

Respectfully Submitted,

**HAYNSWORTH SINKLER BOYD, P.A.**

s/ Jonathan D. Klett

Boyd B. Nicholson, Jr., S.C. Bar No. 65387

Sarah P. Spruill, S.C. Bar No. 68337

Jonathan D. Klett, S.C. Bar No. 103208

P.O. Box 2048

Greenville, South Carolina 29602-2048

(864) 240-3200

[nnicholson@hsblawfirm.com](mailto:nnicholson@hsblawfirm.com)

[sspruill@hsblawfirm.com](mailto:sspruill@hsblawfirm.com)

[jklett@hsblawfirm.com](mailto:jklett@hsblawfirm.com)

*Attorneys for Appellant*

*County of Greenville*

s/ David Holmes

David Holmes

Holmes Law Firm

712 N. Main Street

Greenville, SC 29609

(864) 271-2381

[davidholmes@holmes-law.com](mailto:davidholmes@holmes-law.com)

*Attorney for Appellant*

*City of Simpsonville*

March 25, 2021

Greenville, South Carolina

Other Counsel of Record:

Clayton L. Jennings

Jennings Law Firm, LLC

1151 E. Washington Street

Greenville, SC 29601

(864) 239-0055

[clayton@jenningslawfirm.com](mailto:clayton@jenningslawfirm.com)

*Attorney for Respondent*

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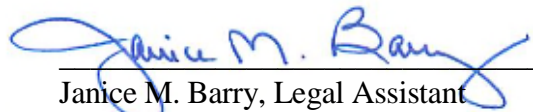
**PROOF OF SERVICE**

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I certify that I have this 25<sup>th</sup> day of March, 2021, served the *Joint Consent Motion for Extension of Time to File Appellants County of Greenville and City of Simpsonville's Reply Briefs* on all counsel of record via electronic mail only, addressed as shown below:

Clayton L. Jennings  
[clayton@jenningslawfirm.com](mailto:clayton@jenningslawfirm.com)  
1151 E. Washington St.  
Greenville, SC 29601

David W. Holmes  
[davidholmes@holmes-law.com](mailto:davidholmes@holmes-law.com)  
HOLMES LAW FIRM  
712 North Main Street  
Greenville, SC 29609



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Janice M. Barry, Legal Assistant  
HAYNSWORTH SINKLER BOYD, P.A.  
Post Office Box 2048  
Greenville, South Carolina 29602  
(864) 240-3223

**Mar 25 2021**

**SC Court of Appeals**

HAYNSWORTH SINKLER BOYD, P.A.  
ONE NORTH MAIN STREET, 2<sup>ND</sup> FLOOR  
P.O. BOX 2048 (29602)  
GREENVILLE, SOUTH CAROLINA 29601  
MAIN 864.240.3200  
FAX 864.240.3300  
www.hsblawfirm.com

**JONATHAN D. KLETT**  
DIRECT 864.240.3257  
jklett@hsblawfirm.com

March 25, 2021

**VIA EMAIL ONLY ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

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 County of Greenville, one of the Appellants in the above-referenced matter. Attached to this email, please find the *Joint Consent Motion for Extension of Time for Appellants County of Greenville and City of Simpsonville to File Reply Briefs*, 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 Order dated March 20, 2020 as amended on 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.



Jonathan D. Klett

Enclosures

cc: Clayton L. Jennings, Esq. (Via email to [clayton@jenningslawfirm.com](mailto:clayton@jenningslawfirm.com))  
David W. Holmes, Esq. (Via email to [DavidHolmes@holmes-law.com](mailto:DavidHolmes@holmes-law.com))