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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable R. Lawton McIntosh

Case No. 2020-001126

Kim Likins, Respondent/Appellant,

v.

C.C. "Skip" Hoagland, Appellant/Respondent.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE OUT OF TIME
APPELLANT/RESPONDENT'S INITIAL RESPONDENT'S BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Appellant/Respondent hereby moves pursuant to Rule 240 and 263(b), SCACR, requesting the Court accept late service of this motion (and Appellant/Respondent's initial respondent brief and matter to be designation to be included in the record on appeal) and for a 2-day extension of the time from the date it was previously due in which to serve and file the Appellant/Respondent's initial respondent's brief and designation of matter to be included in the record on appeal. The grounds for this motion are that there is good cause to grant the requested extension and leave to file this motion out of time, as the following shows:

1. Appellant/Respondent's initial respondent's brief and designation of matter was due for filing and service on Wednesday, April 7, 2021.
2. The current COVID-19 pandemic and its attendant disruption of the ordinary functioning of business has disrupted Appellant/Respondent's counsel's schedule and ordinary pace of work, affecting several matters, including the completion of the initial respondent brief in this case. Specifically, counsel had to conduct significant research on a matter of first legal impression that would impact almost all of the state's newspaper's ability to advertise certain material, as attorney for the state's press association. Such research was sought immediately this week so publications could meet print deadlines regarding such advertising.
3. Appellant/Respondent's initial respondent's brief and designation of matter was due Wednesday, April 7, 2021. If the request is granted, Appellant/Respondent's initial brief and designation of matter to be

included in the record on appeal will be due on Friday, April 9, 2021,
today.

4. Opposing counsel consents to this motion to file and serve this document out of time.
5. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Appellant/Respondent prays for an order extending the time in which to serve and file the Appellant/Respondent's initial respondent's brief and designation of matter to be included in the record on appeal by 2 days, to April 9, 2021.

April 9, 2021

Respectfully submitted,

/s/ Taylor Smith
Taylor M. Smith IV
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PROOF OF SERVICE

I certify that I served the Appellant/Respondent's initial respondent brief and designation of matter to be included in the record on appeal and motion for extension of time to file out of time the same by attaching it to email correspondence and sending that email correspondence on April 9, 2021, addressed as follows:

Gregory M. Alford, Esquire
gregg@alfordlawsc.com

John P. Linton, Jr., Esquire
linton@wgflaw.com

Respectfully submitted,

/s/ Taylor Smith
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April 9, 2021