

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APR 29 2021

SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Maité Murphy, Circuit Court Judge

Appellate Case No.: 2020-001352

Kaci May and Kaci May as guardian ad litem for A.R.M., J.H.M., J.T.M.,  
C.B.M., J.R.M., and J.W.M., ..... Appellants

v.

Dorchester School District Two,  
South Carolina Department of Social Services,  
Michael Leach, and Jasmine Flemister ..... Respondents.

MOTION FOR EXTENSION OF TIME

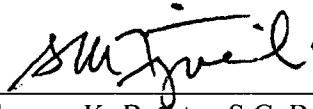
Pursuant to Rule 263(b), SCACR, Respondent, Dorchester School District Two, respectfully moves the Court for a thirty (30) day extension of time in which to file its Initial Brief, up to and including Wednesday, June 9, 2021. Without an extension, Respondent's Initial Brief is due on Monday, May 10, 2021. Respondent's Counsel requires additional time due to trial preparations in two separate cases. Both counsel for Petitioner and counsel for Respondent South Carolina Department of Social Services have consented to this extension. For purposes of uniformity, we request that the extension apply equally to Co-Respondent South Carolina Department of Social Services.

This motion is submitted in good faith and is not intended for purposes of delay. Additionally, this matter does not involve the termination of parental rights, adoption or the

custody of a minor child that would prohibit this brief extension, per South Carolina Supreme Court order issued on October 20, 2011.

Respectfully submitted,

HALLIGAN MAHONEY WILLIAMS SMITH  
FAWLEY & REAGLE, PA



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Dorchester School District Two

Columbia, South Carolina  
April 26, 2021  
Other Counsel of Record:

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Attorneys for SCDSS, Michael Leach and Jasmine Flemister

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**PROOF OF SERVICE**

I certify that I have served the following documents upon all counsel of record via e-mail on **April 26, 2021**, and by filing the originals of same with the South Carolina Court of Appeals, 1220 Senate Street, P.O. Box 11629, Columbia, SC 29211.

**Documents Served:**

- a. Motion for Extension of Time

**Counsel Served:**

Robert J. Butcher, Esq.  
rbutcher@camdensc-law.com  
Deborah J. Butcher, Esq.



**HALLIGAN MAHONEY & WILLIAMS**

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SHENEKA S. LODENQUAI\*  
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April 26, 2021

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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**APR 29 2021**

**SC Court of Appeals**

Re: APPEAL - Kaci May and Kaci May as guardian ad litem for A.R.M., J.H.M., J.T.M., C.B.M. v. Dorchester School District Two, South Carolina Department of Social Services, Michael Leach, and Jasmine Flemister  
Case No. 2020-001352

Dear Ms. Kitchings:

Enclosed for filing please find an original and one copy of a Motion for Extension of Time and Proof of Service in the above-referenced matter, together with the \$50 filing fee. Please return the extra file-stamped copy of the motion to our office in the self-addressed, stamped envelope provided.

Thank you for your attention to this matter.

Sincerely yours,

Susan M. Fittipaldi  
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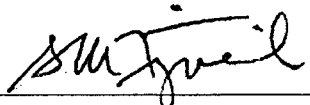
/drh

Enclosure

c: Thomas K. Barlow, Esq.  
Robert J. Butcher, Esq.  
Deborah J. Butcher, Esq.  
Kenneth P. Woodington, Esq.  
William H. Davidson, Esq.

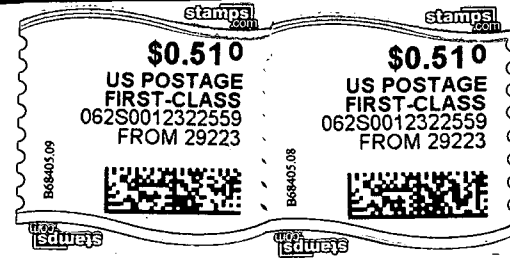
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