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May 12 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 REPLY BRIEF OF APPELLANT**

The Appellant South Carolina Technical College System respectfully moves this Court for an additional extension of time until May 24, 2021, by which to file and serve its Initial Reply 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 Reply Brief is currently due to be filed and served on May 13, 2021.

2. The undersigned counsel requires additional time to complete the Appellant's Initial Reply Brief because of two other appellate briefs due during the same week as well as several court appearances and depositions.

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 May 24, 2021, by which to file and serve its Initial Reply 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*

May 12, 2021

From: [Shannon Polvi](#)
To: [Andrew Lindemann](#)
Subject: RE: Carla Jackson Appeal
Date: Tuesday, May 11, 2021 9:45:38 AM

Dear Andrew,

I consent to the 10 day extension request.

Sincerely,
Shannon

Shannon Polvi

CROMER BABB PORTER & HICKS, LLC

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From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Tuesday, May 11, 2021 6:26 AM
To: Shannon Polvi <Shannon@CBPHlaw.com>
Subject: Carla Jackson Appeal

Shannon:

I hope you are doing well. I have a favor to ask. My initial reply brief is due in this case on Thursday. I have two other appellate briefs due this week as well as several court appearances and depositions. I would like to ask the Court for another 10-day extension. Would you kindly consent to that extension?

Thanks.

Andrew

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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 Reply Brief of Appellant** was made upon all counsel of record by email only this the 12th day of May 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



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Of Counsel

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

May 12, 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

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 the **Motion for Extension of Time to File Initial Reply 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)

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