

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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May 07 2021

SC Court of Appeals

APPEAL FROM BARNWELL COUNTY
In the Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge
Clifton B. Newman, Circuit Court Judge

Lower Court Case No. 2013-CP-06-0059
Appellate Case No. 2019-000599

Lorena Robinson, Elaine Nix, Archie Patterson,
and Tami Bollerman, Plaintiffs,

Of Whom Archie Patterson and Tami Bollerman are the Respondents/Appellants,

v.

South Carolina Department of Employment and
Workforce Appellant/Respondent.

**APPELLANT SCDEW'S CONSENT MOTION FOR AN EXTENSION
OF THE DEADLINE TO THE FILE INITIAL REPLY BRIEF**

Pursuant to Rule 263(b), SCACR, Appellant South Carolina Department of Employment and Workforce (DEW), by and through the undersigned counsel, with the consent of counsel for Respondents Archie Patterson and Tami Bollerman, respectfully submits this request for the Court to stay the current May 13, 2021 deadline by which Appellant must file an initial reply brief and enter an Order granting an eight-day extension of the deadline.

The basis for this request is that the undersigned counsel requires additional time to properly prepare a reply to Respondents' arguments and ensure adequate time for client review. Indeed, the undersigned has an emergency injunction hearing scheduled for May 12, 2021, and a

previously scheduled mediation on May 13, 2021. With this modest eight-day extension, the initial reply brief would be due on May 21, 2021. Because Respondents filed their brief prior to the deadline, an extension would not delay the case.

Accordingly, for good cause shown, the undersigned counsel for Appellant respectfully requests that the Court stay the deadline for filing the initial reply brief and grant this consent motion for an 8-day extension of the deadline in the interests of justice. This is Appellant's first request for an extension of the initial reply brief deadline. As noted above, counsel for Respondents graciously consented to this extension request.

Respectfully submitted,

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Columbia, South Carolina
May 7, 2021