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Jun 15 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the 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 SERVE THE RECORD ON APPEAL**

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 June 21, 2021 deadline by which Appellant must serve the Record on Appeal, see Rule 210(a), SCACR, and enter an Order granting a 30-day extension of the deadline.

The basis for this request is that the undersigned counsel requires additional time to obtain and organize the documents that must be included in the Record on Appeal. As previously noted, this complex class action was litigated in circuit court for the better part of eight years. Further,

given the breadth of documents identified in the parties' respective designations of matter, the parties are attempting to potentially narrow the matter needed to streamline the Record on Appeal for the Court. Counsel cites the press of other business as another basis for the request. With this modest extension, the Record on Appeal would be due on July 21, 2021. This is Respondent's first request for an extension of the deadline to serve the Record on Appeal.

Accordingly, for good cause shown, Appellant respectfully requests that the Court stay the deadline for serving the Record on Appeal and grant this consent motion for a 30-day extension of the deadline in the interests of justice.

Respectfully submitted,

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v.

South Carolina Department of Employment and
WorkforceAppellant/Respondent.

PROOF OF SERVICE

I certify that I have served Appellant South Carolina Department of Employment and Workforce’s Consent Motion for an Extension to Serve the Record on Appeal on the following counsel of record by email on June 15, 2021.

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Columbia, South Carolina
June 15, 2021

Lisle Traywick

From: Lisle Traywick
Sent: Tuesday, June 15, 2021 1:17 PM
To: dan@danwilliamsllaw.com; Brad Hutto; 'Alexander Paterra'; Adam Protheroe; SBerk@scjustice.org
Cc: William H. Davidson II; 'Kenneth P. Woodington'; Bobby Stepp; Rob Tyson; Robin Owens; 'Patterson_Bollerman v_ SCDEW _7652_1500_ Correspondence'
Subject: Patterson v. SCDEW (App. No. 2019-000599) SCDEW's Consent Motion for Extension to Serve Record on Appeal [IMAN-CLIENTS.FID327398]
Attachments: Patterson v. SCDEW (App. No. 2019-000599) SCDEW's Consent Motion for Extension to Serve Record on Appeal(37522061.1).pdf; Patterson v. SCDEW (App. No. 2019-000599) Proof of Service for SCDEW's Consent Motion for Extension to Serve Record on Appeal(37522079.1).pdf

All,

Pursuant to In re Operation of the Appellate Courts During the Coronavirus Emergency, App. No. 2020-000447, Am. Order No. 2020-05-29-02, ¶ (g)(3) (S.C. Sup. Ct. filed May 29, 2020), attached for service upon you is Appellant SCDEW's Consent Motion for an Extension to Serve the Record on Appeal, as well as a Proof of Service, being filed in the Court of Appeals today.

Should you have any questions or concerns, please don't hesitate to contact us. Thanks and have a great afternoon.

Best,

Lisle



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