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**Aug 05 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-06-00059  
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,

v.

South Carolina Department of Employment and  
Workforce ..... Appellant.

**APPELLANT’S CONSENT MOTION FOR EXTENSION OF FINAL BRIEFING  
DEADLINE, LEAVE TO FILE SECOND AMENDED DESIGNATION OF MATTER TO  
BE INCLUDED IN THE RECORD ON APPEAL, AND LEAVE TO FILE  
SUPPLEMENTAL RECORD**

Pursuant to Rule 240, SCACR, Appellant South Carolina Department of Employment and Workforce, by and through the undersigned counsel, submits this consent motion for extension, for leave to file the enclosed Second Designation of Matter to be included in the Record on Appeal, and for leave to supplement the Record on Appeal. The purpose of this amendment is to include (1) matters that were cited in the Initial Brief of Appellant that were unintentionally omitted from the Designation of Matter, (2) matters identified by Respondent that were unintentionally omitted

from the Record on Appeal, and (3) attachments to Sen. John W. Matthews, Jr.'s affidavit that did not appear in the Case Records Search online but were submitted with the affidavit. The parties also request and an additional 20 days from service of the Supplemental Record on Appeal to file and serve final briefs as well as the full Record on Appeal, as supplemented. Counsel for Respondents Archie Patterson and Tami Bollerman consents to this request. Thus, for good cause shown, Appellant respectfully requests that the Court grant this consent motion, accept Appellant's Second Consent Amended Designation of Matter as filed, grant leave to file a Supplemental Record on Appeal, and grant a 20-day extension for filing Final Briefs and the Record on Appeal.

Respectfully submitted,

/s/Vordman Carlisle Traywick, III

Vordman Carlisle Traywick, III (SC Bar No. 102123)

Robert E. Stepp (SC Bar No. 5335)

Robert E. Tyson, Jr. (SC Bar No. 10820)

ROBINSON GRAY STEPP & LAFFITTE, LLC

1310 Gadsden Street

Post Office Box 11449

Columbia, South Carolina 29211

(803) 929-1400

ltraywick@robinsongray.com

rstepp@robinsongray.com

rtyson@robinsongray.com

William H. Davidson, II (SC Bar No. 1558)

Kenneth P. Woodington (SC Bar No. 6213)

DAVIDSON WREN & DEMASTERS, P.A.

1611 Devonshire Drive

Post Office Box 8568

Columbia, South Carolina 29202

(803) 806-8222

wdavidson@dml-law.com

kwoodington@dml-law.com

*Counsel for Appellant South Carolina Department of  
Employment and Workforce*

Columbia, South Carolina  
August 5, 2021

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**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.

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**PROOF OF SERVICE**

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I certify that I have served the Consent Motion for an Extension, Leave to File a Second Amended Designation of Matter to be Included in the Record on Appeal, and Leave to File a Supplemental Record on Appeal on the following counsel of record by email on August 5, 2021.

Daniel W. Williams  
BEDINGFIELD & WILLIAMS  
Post Office Box 616  
Barnwell, South Carolina 29812  
dan@danwilliamsllaw.com

C. Bradley Hutto  
WILLIAMS & WILLIAMS  
Post Office Box 1084  
Orangeburg, South Carolina 29116  
cbhutto@williamsattys.com

Alexander D. Pattera  
THE PATERRA LAW FIRM, LLC  
104 S. Calhoun Street  
Greenville, South Carolina 29601  
alex.pattera@paterrallaw.com

Adam Protheroe  
Susan B. Berkowitz  
S.C. APPLESEED LEGAL JUSTICE CENTER  
Post Office Box 7187  
Columbia, South Carolina 29202  
adam@scjustice.org  
sberk@scjustice.org

*Counsel for Respondents Archie  
Patterson and Tami Bollerman*

William H. Davidson, II  
Kenneth P. Woodington  
DAVIDSON WREN & DEMASTERS, P.A.  
1611 Devonshire Drive  
Post Office Box 8568  
Columbia, South Carolina 29202  
wdavidson@dml-law.com  
kwoodington@dml-law.com

*Counsel for Appellant South Carolina  
Department of Employment and Workforce*

/s/Vordman Carlisle Traywick, III  
Robert E. Stepp  
Robert E. Tyson, Jr.  
Vordman Carlisle Traywick, III  
ROBINSON GRAY STEPP & LAFFITTE, LLC  
1310 Gadsden Street  
Post Office Box 11449  
Columbia, South Carolina 29211  
rstepp@robinsongray.com  
rtyson@robinsongray.com  
ltraywick@robinsongray.com

*Counsel for Appellant South Carolina  
Department of Employment and Workforce*

Columbia, South Carolina  
August 5, 2021

## Lisle Traywick

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**From:** Lisle Traywick  
**Sent:** Thursday, August 5, 2021 6:01 PM  
**To:** dan@danwilliamsllaw.com; Brad Hutto; 'Alexander Paterra'; Adam Protheroe; SBerk@scjustice.org  
**Cc:** William H. Davidson II; Kenneth Woodington; Rob Tyson; Robin Owens; Bobby Stepp; {F327398}.Clients@f8eed.imanage.work  
**Subject:** Patterson v. SCDEW (App. No. 2019-000599) Motion for Extension and Leave to Amend DOM and Supplement Record [IMAN-CLIENTS.FID327398]  
**Attachments:** Patterson v. SCDEW (App. No. 2019-000599) Appellant's Consent Motion for Extension, to Amend DOM, and File Supplemental ROA(37604030.1).pdf; Patterson v. SCDEW (App. No. 2019-000599) Appellant's Second Consent Amended Designation of Matter to be Included in the Record on Appeal(37604019.1).pdf; Patterson v. SCDEW (App. No. 2019-000599) Proof of Service(37604014.1).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, Leave to File a Second Amended Designation of Matter to be Included in the Record on Appeal, and Leave to File a Supplemental Record on Appeal. Also included is the Second Consent Amended Designation of Matter and a Proof of Service being filed in the Court of Appeals this afternoon.

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

Best,

Lisle



**VORDMAN CARLISLE TRAYWICK, III ASSOCIATE**

DIRECT 803.231.7810

[VCARD](#) [VIEW BIO](#)

[ROBINSONGRAY.COM](#)

1310 Gadsden Street

PO Box 11449 (29211)

Columbia, SC 29201

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