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Dec 16 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2021-000535
Case No. 2017-CP-26-6643

Logan Wood and Sarah Wood,..... Respondents,

v.

Horry County School District, Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF OF APPELLANT**

The Appellant Horry County School District respectfully moves this Court for an additional extension of time until January 7, 2022, by which to file and serve its Initial 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 Brief is currently due to be filed and served on December 17, 2021.

2. The undersigned counsel requires additional time to complete the Appellant's Initial Brief due to other court appearances, obligations and court deadlines, including the undersigned counsel was in trial in the Greenville County Court of Common Pleas on December 13, 2021, which also required substantial preparation time in the past week, and the undersigned also has another appellate brief to be filed in the South Carolina Supreme Court on December 16, 2021.

3. The undersigned has consulted with Scott Evans, counsel for the Respondents, and he consented to the requested extension by email (copy attached).

WHEREFORE, the Appellant Horry County School District respectfully requests that it be allowed until January 7, 2022, by which to file and serve its Initial 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

*Counsel for Appellant
Horry County School District*

December 16, 2021

RE: Wood v Horry Co. School District

Scott Evans <scott@evansmoorelaw.com>

Thu 12/16/2021 3:05 PM

To: Andrew Lindemann <Andrew@ldlawsc.com>; James B. Moore III <james@evansmoorelaw.com>; 'justin@justiceislovely.com' <justin@justiceislovely.com>; 'amy@justiceislovely.com' <amy@justiceislovely.com>; 'jmclean@cjplaw.com' <jmclean@cjplaw.com>

Cc: Julie Long <julie@evansmoorelaw.com>; Kathleen Barnes <kbarnes@barneslawfirm.com>

You have our consent Andrew.



Scott C. Evans
Attorney at Law

EVANS MOORE, LLC
121 Screven Street | Georgetown, SC 29440
P: 843.995.5000

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From: Andrew Lindemann <Andrew@ldlawsc.com>

Sent: Thursday, December 16, 2021 1:34 PM

To: Scott Evans <scott@evansmoorelaw.com>; James B. Moore III <james@evansmoorelaw.com>; 'justin@justiceislovely.com' <justin@justiceislovely.com>; 'amy@justiceislovely.com' <amy@justiceislovely.com>; 'jmclean@cjplaw.com' <jmclean@cjplaw.com>

Cc: Julie Long <julie@evansmoorelaw.com>

Subject: Wood v Horry Co. School District

Folks:

I have a favor to ask. Our Appellants' Brief is currently due tomorrow. I am running behind in getting that brief finished primarily because I was in trial earlier this week in Greenville and I have another brief due in the Supreme Court today. Would you kindly consent to additional time through the holidays – until January 7, 2022 – for us to file our Appellant's Initial Brief in this case. It would be most appreciated.

I would like to file the motion this afternoon. If you can respond as soon as possible, I would appreciate it.

Thanks and have a Merry Christmas.

Andrew

Andrew F. Lindemann

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CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court's Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, 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 Brief of Appellant** was made upon all counsel of record by email only at the below email address this the 16th day of December 2021, as follows:

James B. Moore, III, Esquire

Scott C. Evans, Esquire

Evans Moore, LLC

Email: james@evansmoorelaw.com

Email: scott@evansmoorelaw.com

Justin Lovely, Esquire

Amy Lawrence, Esquire

The Lovely Law Firm

Email: justin@justiceislovely.com

Email: amy@justiceislovely.com

Joseph P. McLean, Esquire

Clarke Johnson Peterson & McLean, P.A.

Email: jmclean@cjpmlaw.com

s/ Andrew F. Lindemann



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JAMES M. DAVIS, JR.†
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Email: jim@ldlawsc.com

*Also Admitted in North Carolina
†Certified Mediator

December 16, 2021

Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

RECEIVED
Dec 16 2021
SC Court of Appeals

RE: Logan Wood and Sarah Wood v. Horry County School District
Appellate Case Number: 2021-000535
Civil Action Number: 2017-CP-26-6643
Claim Number: B4173
Our File Number: 104.20465

Dear Ms. Kitchings:

In accordance with Section (b)(2) of the Supreme Court's Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, please find enclosed for filing the **Motion for Extension of Time to File Initial Brief of Appellant** in the above referenced matter. In accordance with Section (d)(1) of this same order, I am hereby serving copies on all counsel of record by email only. A check for the \$50.00 filing fee has been placed in the U.S. Mail.

If you have any questions, please advise. Thank you for your consideration of this request.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosure

cc: James B. Moore, III, Esquire (w/ Enclosure, Via Email Only)
Scott C. Evans, Esquire (w/ Enclosure, Via Email Only)
Justin Lovely, Esquire (w/ Enclosure, Via Email Only)
Amy Lawrence, Esquire (w/ Enclosure, Via Email Only)
Joseph P. McLean, Esquire (w/ Enclosure, Via Email Only)