

**RECEIVED**  
**Dec 21 2021**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Judge

Appellate Case No. 2021-000847

Tony T. Good.....Appellant,

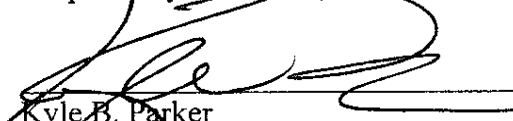
v.

Tomekia Means and United States  
Department of Agriculture.....Respondents.

MOTION FOR EXTENSION

Appellant moves, pursuant to Rule 240, South Carolina Appellate Court Rules, for an extension of thirty (30) days to file and serve his Initial Brief. This motion is made with the consent of opposing counsel. The motion is based on the fact that the timing of the service of the transcript of the proceedings below resulted Appellant’s brief becoming due at a time when the undersigned’s ability to meet the deadline of December 22, 2021 is strained due to prior commitments with other cases coupled with staffing interruptions due to COVID quarantine. If such extension were granted, the new deadline would be January 21, 2022.

Respectfully submitted,



Kyle B. Parker  
POPE PARKER JENKINS, P.A.  
1508 College Street  
Newberry, SC 29108  
Phone (803) 948-9263  
Fax (803) 276-8684

Newberry, South Carolina  
December 20, 2021

Attorneys for Appellant

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

**Dec 21 2021**

**SC Court of Appeals**

APPEAL FROM NEWBERRY COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Judge

Appellate Case No. 2021-000847

Tony T. Good.....Plaintiff/Appellant,

v.

Tomekia Means and United States  
Department of Agriculture.....Defendants/Respondents.

PROOF OF SERVICE

I certify that I have served a copy of the Motion for Extension on the Respondents by mailing a copy of same via regular United States mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below, addressed to their respective attorneys of record as follows:

George J. Conits  
U.S. Attorney's Office  
District of South Carolina  
55 Beattie Place, Suite 700  
Greenville, SC 29601  
Attorney for USDA

Dean A. Hayes  
McCabe, Trotter & Beverly, P.C.  
P.O. Box 212069  
Columbia, SC 29221  
Attorney for Tomekia Means



Kyle B. Parker  
POPE PARKER JENKINS, P.A.  
1508 College Street  
Newberry, SC 29108  
803-276-2532 (phone)  
803-276-8684 (telefax)  
Attorneys for Respondent

Newberry, South Carolina  
December 20, 2021



PO Box 190  
1508 College Street  
Newberry, SC 29108  
P: 803.276.2532  
F: 803.276.8684  
  
[www.ppjlaw.com](http://www.ppjlaw.com)

Thomas H. Pope III  
W. Chad Jenkins  
Kyle B. Parker  
  
Thomas H. Pope  
(1913-1999)  
Joseph W. Hudgens  
(1932-2019)

December 20, 2021

**RECEIVED**

**Dec 21 2021**

**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

RE: Tony T. Good v. Tomekia Means and USDA  
Appellate Case No. 2021-000847

Dear Ms. Kitchings:

Enclosed please find one (1) original and seven (7) copies of a Motion for Extension, Proof of Service and this firm's check in the amount of \$50 to cover the filing fee. Please file the originals and the six (6) copies required by rule 240(d) of the South Carolina Appellate Court Rules and return to me the additional filed stamped copy.

Should you have any questions, concerns, or require something further, please do not hesitate to contact me. I thank you in advance for your kind attention to the matter. With my kindest regards, I am,

Sincerely,

POPE PARKER JENKINS, P.A.



Kyle B. Parker

KBP/rb

Enc.

cc: Dean A. Hayes (via email & US Mail)  
George J. Conits (via email & US Mail)

# POPE PARKER JENKINS, P.A.

1508 COLLEGE STREET  
P.O. BOX 190  
NEWBERRY, SC 29108  
(803) 276-2532  
[www.ppjlaw.com](http://www.ppjlaw.com)

**RECEIVED**

**Dec 21 2021**

**SC Court of Appeals**

## FAX COVER SHEET

**TO:** The Hon. Jenny Abbott Kitchings **FROM:** Kyle B. Parker  
**DATE:** December 21, 2021 **POPE PARKER JENDINS, P.A.**  
**FAX NO:** 803-734-1839 **Phone:** (803) 276-2532  
**RE:** Appellate Case No. 2021-000847 **kyle@ppjlaw.com**

**TOTAL PAGES FAXED (including cover sheet):** 4

### MESSAGE:

### CONFIDENTIALITY NOTE:

The information contained in this facsimile message is attorney-privileged and may be confidential and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, please be advised that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us by telephone and return the facsimile to us at the above address, via the U.S. Postal Service. Thank you

**If you should have any problem receiving this fax or all of its contents, please call  
(803)276-2532**