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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas

R. Lawton McIntosh, Judge

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DEC 22 2021

SC Court of Appeals

Appellate Case No. 2021-000847

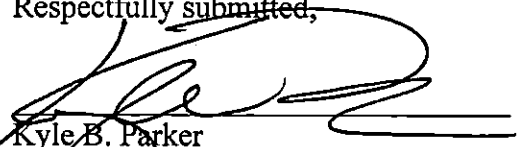
Tony T. Good.....Appellant,

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
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Newberry, SC 29108
Phone (803) 948-9263
Fax (803) 276-8684

Newberry, South Carolina
December 20, 2021

Attorneys for Appellant

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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



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Thomas H. Pope III
W. Chad Jenkins
Kyle B. Parker

Thomas H. Pope
(1913-1999)
Joseph W. Hudgens
(1932-2019)

December 20, 2021

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

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

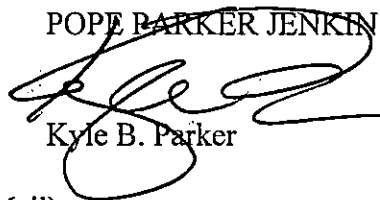
Dear Ms. Kitchings:

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)



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

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