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DEC 23 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

Appellate Case No.: 2021-001398

Paulette Lawrence,

Appellant,

V.

City of North Charleston,

Respondent.

MOTION FOR EXTENSION OF TIME FOR APPELLANT TO
SERVE AND FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO
BE INCLUDED IN THE RECORD ON APPEAL

Pursuant to Rule 240, SCACR, appellant Paulette Lawrence moves for an extension of time in which to file and serve appellant's Initial Brief and Designation of Matter to be included in the Record on Appeal ("Designation of Matter"). Appellant requests an extension of ninety days to file the Initial Brief and Designation of Matter which are currently due December 24, 2021. This is the first request for an extension filed by Appellant.

The grounds for this motion are that other impending professional matters that have created a need for additional time to prepare the Initial Brief and Designation of Matter. Additionally, on December 15, 2020, Appellant requested a transcript from the previous Motion to Dismiss in this matter to include in the Initial Brief and Record on Appeal and additional time is needed to receive that transcript. I have notified opposing counsel of our intent to file this motion, and they have no

objection to our request for an extension. Granting this motion would require the Initial Brief and Designation of Matter to be filed with the Court no later than March 24, 2022.

For these reasons, Appellant respectfully requests an extension of the deadline for filing and serving the Initial Brief and Designation of Matter until March 24, 2022.

December 20, 2021

/s Ashley B. Cornwell
Ashley B. Cornwell
Cornwell Law Firm, LLC
1470 Ben Sawyer Blvd., Suite 14
Mount Pleasant, SC 29464
843-595-6003
acornwell@cornwellfirm.com
Attorney for Appellant

Other Counsel of Record:
Robin Jackson
Senn Legal, LLC
3 Wesley Drive
Charleston, SC 29407
843-556-4045
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Attorney for Respondent

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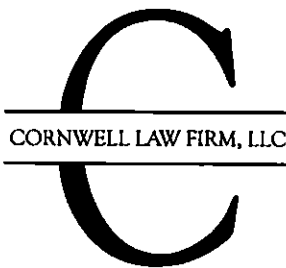
PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Robin Jackson, Counsel for the Respondent, via email and by depositing a copy of it in the United States Mail on December 20, 2021, addressed to counsel of record as follows:

Robin Jackson
Senn Legal, LLC
3 Wesley Drive
Charleston, SC 29407
Attorney for Respondent

December 20, 2021

/s Ashley B. Cornwell
Ashley B. Cornwell
Cornwell Law Firm, LLC
1470 Ben Sawyer Blvd., Suite 14
Mount Pleasant, SC 29464
843-595-6003
acornwell@cornwellfirm.com
Attorney for Appellant



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SC Court of Appeals

December 20, 2021

South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Paulette Lawrence v. City of North Charleston
Appellate Case No.: 2021-001398

Dear Madam Clerk:

Enclosed please find Plaintiff's Motion for Extension of Time along with Proof of Service, which were originally sent for filing via email to ctappfilings@sccourts.org, and a firm check in the amount of \$50.00 for the filing fee in the above-reference matter. Please file these documents and send my office certified copies in the enclosed pre-stamped return envelope.

If you have any questions or need any additional information, please do not hesitate to contact my office. Thank you for your assistance in this matter.

With kind regards, I am

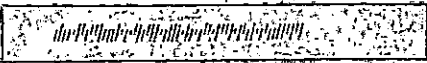
Sincerely,

Ashley B. Cornwell

Encl.

Cc: Robin Jackson, Esquire

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Mount Pleasant, SC 29464
(843) 595-6003
acornwell@cornwellfirm.com



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Mount Pleasant, SC 29464

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