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Mar 21 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
DeAndrea Gist Benjamin, Circuit Court Judge

Appellate Case No. 2020-001135
Case No. 2015-CP-40-01805

Wendy BrawleyRespondent-Appellant,

v.

Richland County, South Carolina,Appellant-Respondent.

RESPONDENT-APPELLANT’S MOTION FOR EXTENSION OF TIME

The Respondent-Appellant, Wendy Brawley, respectfully moves this Court for an extension of time until April 22, 2022, to file and serve Respondent-Appellant Brief of the Respondent to be included in the Record on Appeal. The grounds for this Motion are as follows:

1. The Respondent-Appellant’s Brief is currently due to be filed and served on March 23, 2022.
2. The undersigned counsel respectfully requests additional time to complete the Brief of the Respondent-Appellant due to recent and upcoming workload issues.
3. The undersigned has consulted with counsel for the Appellant-Respondent, Richland County, South Carolina, and obtained consent to our request.

WHEREFORE, the Respondent-Appellant, Wendy Brawley, respectfully requests to be allowed until April 22, 2022, by which to file and serve its Brief of the Respondent to be included in the Record on Appeal.

/s Jenkins M. Mann

Jenkins M. Mann, Esq. (SC Bar No.: 74894)

Shaun C. Blake (SC Bar No.: 76349)

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COUNSEL FOR RESPONDENT-APPELLANT

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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 Rogers Lewis Jackson Mann & Quinn LLC, counsel for the Respondent-Appellant, Wendy Brawley, does hereby certify that service of the *Respondent-Appellant’s Motion for Extension of Time* was made upon all counsel of record by email only this the 21st day of March 2022:

Andrew F. Lindemann, Esq.
Lindemann & Davis P.A.
andrew@ldlawsc.com

/s/ Jenkins M. Mann

Jenkins M. Mann, Esq. (SC Bar No.: 74894)
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Via Email and First Class Mail

The Honorable Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
ctappfilings@sccourts.org

Re: Wendy Brawley v. Richland County, South Carolina
Appellant Case No.: 2020-001135
Civil Case No.: 2015-CP-40-1805

Dear Ms. Kitchings,

Pursuant to Section (b)(2) of the Supreme Court's Order RE: Methods of Electronic Filing and Service Under 262 of the South Carolina Appellate Court Rules, please find enclosed the Motion for Extension of Time on behalf of the Respondent-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 assistance in this matter.

Sincerely,

s/ Jenkins M. Mann
Jenkins M. Mann

cc: Andrew F. Lindemann (*Via Email only*)