

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-40-1805

Wendy Brawley,..... Respondent-Appellant,

v.

Richland County, South Carolina Appellant-Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE
INITIAL RESPONDENT'S BRIEF OF
APPELLANT-RESPONDENT RICHLAND COUNTY**

The Appellant-Respondent Richland County respectfully moves this Court for an additional extension of time until April 22, 2022, by which to file and serve its Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellant-Respondent's motion is based on the following grounds:

1. The Appellant-Respondent's Initial Respondent's Brief is currently due to be filed and served on April 13, 2022.

2. The undersigned counsel requires additional time to complete the Initial Respondent's Brief of the Appellant-Respondent because of a Supreme Court brief due on April 14, 2022 involving a habeas corpus matter pending in the Court's original jurisdiction. Additionally, the undersigned has an outpatient medical procedure the morning of April 14, 2022.

3. The Initial Respondent's Brief of the Respondent-Appellant Wendy Brawley is due April 22, 2022. With this requested extension, the briefing schedule for the parties will be the same.

4. The undersigned has consulted with counsel for the Respondent-Appellant Wendy Brawley who has consented to the requested extension by email (copy attached).

WHEREFORE, the Appellant-Respondent Richland County respectfully requests that it be allowed until April 22, 2022, by which to file and serve its Initial Respondent's 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-Respondent
Richland County*

April 13, 2022

From: [Jenkins Mann](#)
To: [Andrew Lindemann](#)
Cc: [Shaun C. Blake](#); [Jennifer Baker](#)
Subject: Re: Brawley v. Richland County
Date: Wednesday, April 13, 2022 7:25:41 AM

Of course.

Sent from my Verizon, Samsung Galaxy smartphone
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From: Andrew Lindemann <Andrew@ldlawsc.com>
Sent: Wednesday, April 13, 2022 12:26:10 AM
To: Jenkins Mann <jmann@rogerslewis.com>
Cc: Shaun C. Blake <sblake@rogerslewis.com>; Jennifer Baker <Jennifer@ldlawsc.com>
Subject: Brawley v. Richland County

[This email originated outside the organization. Do not click any links or attachments unless you know the sender]

Jenkins and Shaun:

I have a favor to ask. I have my Respondent's Brief due in the Brawley case on Wednesday (April 13th) as well as a Supreme Court brief due on Thursday (April 14th). However, I also have a medical procedure on Thursday and really need to devote my time on Wednesday to the Supreme Court brief for that reason.

Your Respondent's Brief is currently due on 4-22. Will you consent to a nine-day extension so that my Respondent's Brief would also be due on 4-22. That will really help me out.

Thanks.

Andrew

Andrew F. Lindemann
Lindemann & Davis, P.A.
5 Calendar Court, Suite 202
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Columbia, South Carolina 29260
Direct Dial: 803-881-8921
Email: andrew@ldlawsc.com

RECEIVED

Apr 13 2022

SC Court of Appeals

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-Respondent Richland County, does hereby certify that service of the **Motion for Extension of Time to File Initial Respondent's Brief of Appellant-Respondent Richland County** was made upon all counsel of record by email only this the 13th day of April 2022:

Jenkins M. Mann, Esquire
Shaun C. Blake, Esquire
Rogers, Lewis, Jackson, Mann & Quinn, LLC
Email: jmann@rogerslewis.com
Email: sblake@rogerslewis.com

s/ Andrew F. Lindemann



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Email: jim@ldlawsc.com

*Also Admitted in North Carolina
†Certified Mediator

April 13, 2022

Via Email Only

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

RE: Wendy Brawley v. Richland County, South Carolina
Appellate Case Number: 2020-001135
Civil Action Number: 2015-CP-40-1805
Our File Number: 314.9670

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 Respondent's Brief of Appellant-Respondent Richland County** 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. The \$50.00 filing fee will be mailed to the Court via 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
Enclosures

cc: Jenkins M. Mann, Esquires (*Via Email Only*)
Shaun C. Blake, Esquires (*Via Email Only*)

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Apr 13 2022
SC Court of Appeals