

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Charleston County  
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

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Appellate Case No. 2022-000392  
Circuit Court Case No. 2021-CP-10-00785

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The Wolf Marie Vernon Trust,

v.

The Town of Mount Pleasant and the Mount Pleasant Board of  
Zoning Appeals,

Appellant,

Respondents.

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**MOTION FOR EXTENSION OF TIME TO  
FILE/SERVE INITIAL BRIEF OF RESPONDENTS**

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CLEMENT RIVERS, LLP  
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*Attorneys for Respondents*

**RECEIVED**  
**Aug 18 2022**  
**SC Court of Appeals**

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Respondents The Town of Mount Pleasant and the Mount Pleasant Board of Zoning Appeals, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(2), the deadline for Respondents' initial brief and designation of matter is Friday, August 19, 2022. On account of work-related and other time commitments, Respondents respectfully request this deadline be extended by 30 days. Respectfully, Respondents believe this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

WHEREFORE, Respondents move this Honorable Court to grant them an additional extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be September 19, 2022, according to the undersigned's calculations. Further, Respondents respectfully request the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

CLEMENT RIVERS, LLP

By: *s/Stephen L. Brown*

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*Attorneys for the Respondent*

Charleston, South Carolina  
August 18, 2022

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP  
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Attorneys for Respondents

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I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENTS** was served on all other parties to this appeal on August 18, 2022, via email (see attached) to their following counsel of record:

Thomas J. Rode (thomas@tktlawyers.com )  
Thurmond Kirchner & Timbes, P.A.  
15 Middle Atlantic Wharf  
Charleston, SC 29401  
Attorneys for Appellant

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Stephen L. Brown  
Stephen L. Brown (SC Bar No. 66468)  
Attorneys for Respondents

Charleston, South Carolina  
August 18, 2022

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Thursday, August 18, 2022 12:13 PM  
**To:** 'scerone@tktlawyers.com'; 'thomas@tktlawyers.com'; 'michael@tktlawyers.com'  
**Cc:** 'Stephen Brown (sbrown@ycrlaw.com)'; Justman, Aimee; Hines, Russell; Mantiply, Madison; Quisenberry, Brian  
**Subject:** Wolfe Marie Vernon Trust v. Town of Mount Pleasant // Appellate Case No. 2022-000392  
**Attachments:** Mtn for Ext for Respondents' Initial Brief.pdf

Enclosed please find Respondents' Motion for Extension of Time to File/Serve their Initial Brief which will be filed today in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
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