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Sep 12 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
J. Cordell Maddox, Jr., Circuit Court Judge

Civil Action No. 2021-CP-26-05002
Appellate Case No. 2022-000596

Horry County, a Political Subdivision of the State of South Carolina,Plaintiff/Appellant,

v.

Helicopter Solutions, Inc., d/b/a Helicopter Adventures,
Freddie Rick, and Burroughs & Chapin Company, Inc..... Defendants/Appellees.

**APPELLANT’S UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME
TO FILE INITIAL REPLY BRIEF**

Appellant Horry County, by and through counsel, respectfully moves the Court, pursuant to Rules 240 and 263, SCACR, for entry of an order extending the time within which the County may file its initial reply brief by ten (10) days. The grounds for this motion are as follows:

1. Respondents filed their initial response brief in this matter on September 6, 2022, which deadline was the result of a 30-day extension that the Court granted at the Respondents’ request.

2. Under Rule 208(a)(3), SCACR, the standard deadline for the County to file its initial reply brief falls on Friday, September 16. The County seeks a 10-day extension of that deadline to allow its counsel adequate time to prepare its reply brief.

3. After receiving the brief on September 6, counsel for the County, Scott Bergthold, was working on an appellate brief that he filed the night of September 8.

4. Mr. Bergthold has another appellate brief due in the Georgia Court of Appeals on September 12, additional matters due September 14, and previously scheduled out-of-state travel on September 16 for a wedding on September 17. These commitments, and the press of other matters, will impede his ability to complete the brief on the current deadline.

5. Accordingly, the County respectfully requests that this Court enter an Order extending the deadline for the County's initial reply brief by ten days, making the new deadline Monday, September 26, 2022.

6. This motion is supported by the grounds set forth herein and the South Carolina Appellate Court Rules. Counsel for the County conferred with counsel for Respondents and can state that Respondents do not oppose this requested extension.

Respectfully submitted,

/s/ Michael W. Battle
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Company, Inc., Defendants/Appellees.

PROOF OF SERVICE

I certify that on September 12, 2022, I have served all counsel in this action with a copy of **Appellant's First Motion for Extension of Time to File Initial Reply Brief**, via electronic mail, to the following addresses:

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