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**Sep 28 2022**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE CIRCUIT COURT  
FOURTEENTH JUDICIAL CIRCUIT

The Honorable Bentley D. Price

Appellate Court Case No. 2022-000300  
Circuit Court Case No. 2021-CP-07-01241

Historic Beaufort Foundation, .....Appellant,

v.

City of Beaufort, City of Beaufort Historic District Review Board,  
and The Beaufort Inn, LLC,..... Respondents.

AND

West Street Farms, LLC and Mix Farms, LLC, ..... Appellants,

v.

City of Beaufort, City of Beaufort Historic District Review Board,  
and The Beaufort Inn, LLC,..... Respondents.

**APPELLANTS' MOTION FOR EXTENSION**

Pursuant to SCACR, Rules 240 and 263(b), Appellants Historic Beaufort Foundation, West Street Farms, LLC, and Mix Farms, LLC (“Appellants”) move this Honorable Court to grant an extension of time to serve and file their Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal due to other work-related time commitments in the undersigned counsels’ schedules. The current deadline for Appellants to serve and file their Initial Reply Brief and Designation of Matter is October 3, 2022. Appellants respectfully request the deadline be extended

until October 13, 2022. The undersigned consulted with counsel for Respondents prior to filing this motion who indicated they do not oppose this request.

September 28, 2022

s/John A. Massalon

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*West Street Farms, LLC and Mix Farms, LLC*

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Circuit Court Case No. 2021-CP-07-01241 and  
Circuit Court Case No. 2021-CP-07-01231

Historic Beaufort Foundation, .....Appellant,

v.

City of Beaufort, City of Beaufort Historic District Review Board,  
and The Beaufort Inn, LLC, ..... Respondents.

AND

West Street Farms, LLC and Mix Farms, LLC, ..... Appellants,

v.

City of Beaufort, City of Beaufort Historic District Review Board,  
and The Beaufort Inn, LLC, ..... Respondents.

PROOF OF SERVICE

I certify that Appellants' Motion for Extension was served upon Respondents City of Beaufort, City of Beaufort Historic District Review Board, and The Beaufort Inn, LLC via e-mail to counsel of record listed below on September 28, 2022. A copy of the service e-mail is attached hereto as Exhibit A.

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September 28, 2022

Exhibit “A”

## Charline Barrasso

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**From:** Charline Barrasso  
**Sent:** Wednesday, September 28, 2022 4:50 PM  
**To:** Nicholson, Ned; Leach, Wade; William B. Harvey III, Esquire (bharvey@harveyandbattey.com)  
**Cc:** John A. Massalon; andy@austengowder.com; Rachel Fete; Hampton, Valerie; Carissa Steichen; Ackbersingh-Teed, Angella; smalphrus@harveyandbattey.com  
**Subject:** RE: Reply Brief - Extension request (HBF v. City of Beaufort Appeal)  
**Attachments:** 20220928 Motion for Extension.pdf; 20220928 Clerk of Court.pdf

Counsel,

Good afternoon. Attached please find Appellants' Motion for Extension, along with correspondence to the Clerk of Court enclosing the filing fee. Service is being provided via email only. If you would like a hard copy, please let me know and I will be happy to mail one to you.

Thank you,

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