

**RECEIVED**

**Oct 04 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

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Case No.: 2018-CP-10-4083

Appellate Tracking No.: 2022-001114

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Charleston Carriage Works, L.L.C.,

Appellant,

v.

Charleston Animal Society, Ellen Harley and  
Charleston Carriage Horse Advocates, Inc.,

Respondents.

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MOTION FOR THIRTY DAY EXTENSION  
(second request)

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Appellant's initial brief is due on or before Wednesday, October 12, 2022. Charleston Carriage Works, L.L.C. moves for an Order granting the Appellant a second thirty (30) day extension to file its initial brief and designation of contents of record on appeal. This motion is based on the ground that appellant's counsel suffered a heart attack on September 6, 2022, which required admission to M.U.S.C. hospital and continuing out-patient treatment, (and upcoming additional surgical procedures). More importantly, on October 1, 2022, the Goldstein's welcomed Ari<sup>1</sup> Abraham Goldstein to the world in Jacksonville, Florida, weighing 7lbs., 11 oz. and 21 inches in length, and Appellant's counsel requests time out of the office to make his acquaintance. Finally, the undersigned shows further that the parties in this matter pre-ordered transcripts of

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<sup>1</sup> The child entered the world almost simultaneously with Dansby Swanson hitting a 2-run homerun against the New York Mets, and yet despite the undersigned's recommendation that the child be named "Dansby," higher authorities overruled this suggestion.

record prior to the entry of Final Orders under review, the receipt of which prior to the filing the Notice of Appeal accelerated the process for preparation of appellate briefs. This application makes Appellant's initial brief due on or before Friday, November 11, 2022

October 4, 2022

/s/Thomas R. Goldstein  
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#### DUTY OF CONSULTATION

I certify that prior to making this request, I consulted with opposing counsel who do not oppose Appellant's request.

October 4, 2022

/s/ Thomas R. Goldstein  
Thomas R. Goldstein

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Respondents.

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**PROOF OF SERVICE**

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I certify that I have served the Appellant's Motion for Thirty (30) Day Extension on Charleston Animal Society, Charleston Carriage Horse Advocates and Ellen Harley by depositing a copy of it in the United States Mail (and by providing an electronic copy), postage prepaid on October 4, 2022, addressed to their attorneys of record, Elizabeth Palmer at her office Saxton & Stump at 151 Meeting Street, Suite 350, Charleston, South Carolina 29401 and to Joseph Thompson and Spencer Gill at their office Hall Booth Smith, P.C. at 111 Coleman Boulevard, Mt. Pleasant, S. C. 29464, and to Jenkins Mann at his office, Mann Blake & Jackson at 1901 Main Street, Suite 1205, Columbia, South Carolina 29201.

October 4, 2022

/s/Thomas R. Goldstein

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October 4, 2022

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Hon. Jenny A. Kitchings  
Clerk of Court  
S. C. Court of Appeals  
P. O. Box 11629  
Columbia, S. C. 29211

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**SC Court of Appeals**

RE: Tracking No. 2022-001114  
Charleston Carriage Works, LLC v. Charleston Animal Society, et. al.

Dear Ms. Kitchings,

I enclose the Appellant's Motion for Thirty (30) Day Extension along with a certificate of service and our firm's check in the amount of \$50.00 to cover this request. Please let me know if you need anything further to process this motion. I thank you in advance for your attention to this request. With kind regards I am

Very truly yours,

  
Belk, Cobb, Infinger & Goldstein, P.A.  
Thomas R. Goldstein

enclosure: Motion for Extension, check No. 20089

Other counsel of record:  
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