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Dec 12 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2018-CP-10-4083

Charleston Carriage Works, LLC, Appellant,

v.

Charleston Animal Society, Ellen Harley, and
Charleston Carriage Horse Advocates, LLC. Respondents.

RESPONDENTS' MOTION FOR EXTENSION OF TIME

The Respondents, Charleston Animal Society, Ellen Harley, and Charleston Carriage Horse Advocates, LLC respectfully move this Court for an extension of time until January 11, 2023, to file and serve Respondents Brief of the Respondent. The grounds for this Motion are as follows:

1. The Respondents' Initial Brief is currently due to be filed and served on December 12, 2022.
2. The undersigned counsel respectfully requests additional time for the Brief of the Respondents on the grounds that the Respondents have filed a motion to strike portions of the Appellant's Initial Brief, a motion which they believe needs to be resolved prior to their filing Respondents' Initial Brief.

3. The undersigned has consulted with counsel for the Appellant, Charleston Carriage Works, LLC, and obtained consent to our request.

WHEREFORE, the Respondents respectfully request to be allowed until January 11, 2023, by which to file and serve their Initial Brief of the Respondent.

Respectfully submitted,

/s/ Elizabeth J. Palmer
Elizabeth J. Palmer (SC Bar #73680)
Saxton & Stump, LLC
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Attorneys for Respondent
Charleston Animal Society

/s/ Jenkins Mann
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Attorneys for Respondents Charleston
Carriage Horse Advocates and Ellen Harley

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PROOF OF SERVICE

I do hereby certify that on December 12, 2022, I have served all counsel in this action with a copy of the *Respondent's Motion for Extension of Time* via email to the following email address:

Thomas R. Goldstein, Esquire
Belk, Cobb, Infinger & Goldstein, P.A.
tgoldstein@cobblaw.net

Attorney for Appellant



Donna M. Croft, Legal Assistant
Rogers, Lewis, Jackson, Mann & Quinn, LLC

ROGERS LEWIS
ATTORNEYS AT LAW

Donna M. Croft, Legal Assistant
dcroft@rogerslewis.com

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SC Court of Appeals

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Via US Mail and E-Mail

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Charleston Carriage Works, LLC, v. Charleston Animal Society, et al
Appellate Case No.: 2022-001114

Dear Ms. Kitchings,

Please find enclosed a check in the amount of \$50.00, to cover the filing fee for Respondents Motion for Extension of time and Proof of Service in connection to the matter referenced above. Also, enclosed is a copy of the motion which has been e-filed.

Should you have any questions or concerns, please do not hesitate to contact our office.

In warmest regards,

Sincerely,



Donna M. Croft
Legal Assistant

Enclosure(s):

Cc: (Via Email only): Thomas Goldstein, Esq.