

**RECEIVED**

**Jan 20 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Robert L. Reibold, Administrative Law Judge

---

Appellate Case No. 2022-000980

---

Steven Charles Poletti, ..... Appellant,

vs.

Charleston County Assessor, ..... Respondent.

---

**MOTION FOR EXTENSION**

---

Respondent Charleston County Assessor respectfully moves this Court pursuant to Rule 263, SCACR, for an extension of time to file the Initial Brief and Designation of Matter, which are currently due February 16, 2023. Counsel for Appellant has consented to this extension and does not oppose this Motion. The basis for this Motion is that the spouse of counsel for Respondent is currently scheduled for surgeries on February 1, 2023, and February 8, 2023, requiring the presence and attention and post-operative care of counsel for Respondent. Respondent requests a forty-five (45) day extension to serve and file the Initial Brief and Designation of Matter, making them due on April 3, 2023.

CHARLESTON COUNTY ATTORNEY’S OFFICE

/s/ Bernard E. Ferrara, Jr.

Bernard E. Ferrara, Jr., Esq. (S.C. Bar No. 9034)  
Kevin M. DeAntonio, Esq. (S.C. Bar No. 101169)  
Brittney M. Darnell, Esq. (S.C. Bar No. 105274)  
Lonnie Hamilton, III Public Services Building  
4045 Bridge View Drive  
North Charleston, South Carolina 29405  
(843) 958-4010  
bferrara@charlestoncounty.org  
kdeantonio@charlestoncounty.org  
bdarnell@charlestoncounty.org

January 20, 2023

Attorneys for Respondent

RECEIVED

Jan 20 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
Robert L. Reibold, Administrative Law Judge

Appellate Case No. 2022-000980

Steven Charles Poletti, ..... Appellant,

vs.

Charleston County Assessor, ..... Respondent.

PROOF OF SERVICE

The undersigned hereby certifies that on this 20<sup>th</sup> day of January, 2023, he served counsel for the Appellant with a copy of Respondent Charleston County Assessor’s Motion for Extension of Time in this matter by mailing a copy of the same via electronic mail and U.S. First Class Mail, postage prepaid, upon counsel of record addressed as follows:

Felix C. Pelzer, Jr., Esquire  
G.P. Diminich, Esquire  
Nicholas C.C. Stewart, Esquire  
SHUMAKER, LOOP & KENDRICK, LLP  
176 Croghan Spur Road, Suite 400  
Charleston, South Carolina 29407

/s/ Bernard E. Ferrara, Jr.  
Bernard E. Ferrara, Jr., Esquire, S.C. Bar No. 9034  
Kevin M. DeAntonio, Esquire, S.C. Bar No. 101169  
Brittney M. Darnell, Esquire, S.C. Bar No. 105274  
CHARLESTON COUNTY ATTORNEY’S OFFICE  
Lonnie Hamilton, III Public Services Building  
4045 Bridge View Drive  
North Charleston, South Carolina 29405  
(843) 958-4010  
bferrara@charlestoncounty.org  
kdeantonio@charlestoncounty.org  
bdarnell@charlestoncounty.org  
Attorneys for Respondent

**BERNARD E. FERRARA, JR.**  
CHIEF DEPUTY COUNTY ATTORNEY



CHARLESTON COUNTY ATTORNEY'S OFFICE  
Lonnie Hamilton, III Public Services Building  
4045 Bridge View Drive  
North Charleston, South Carolina 29405-7464  
Telephone: 843.958.4014  
Facsimile: 843.958.4017  
bferrara@charlestoncounty.org

January 20, 2023

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
**Jan 20 2023**  
**SC Court of Appeals**

Re: Steven Charles Poletti vs. Charleston County Assessor  
Appellate Case No. 2022-000980

Dear Ms. Kitchings:

I hope this finds you well. Our office represents the Respondent Charleston County Assessor in the above-referenced appeal.

I have enclosed the original and seven (7) copies of Respondent's Motion for Extension of time pursuant to Rule 263, SCACR, to file the Initial Brief and Designation of Matter, which are currently due February 16, 2023. Respondent requests a forty-five (45) day extension to serve and file the Initial Brief and Designation of Matter, making them due on April 3, 2023. Counsel for Appellant has consented to this extension and does not oppose the Motion.

I have enclosed a check in the amount of \$50.00 to cover the filing fee. Please file the original and copies of the Motion and return a copy to me in the enclosed envelope. By copy of this letter to counsel for Appellant, I am notifying them of this filing.

Should you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

CHARLESTON COUNTY ATTORNEY'S OFFICE

Bernard E. Ferrara, Jr.

BEFJR/ca  
Enclosures

cc: Felix C. Pelzer, Jr., Esquire  
G. P. Diminich, Esquire  
Nicholas C.C. Stewart, Esquire