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Feb 28 2023
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Mikell R. Scarborough, Master-in-Equity

Appellate Case No. 2022-001114
Case No. 2018-CP-10-4083

Charleston Carriage Works, LLC,Appellant,

v.

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

RESPONDENTS' MOTION FOR EXTENSION OF TIME

The Respondents, Charleston Animal Society, Ellen Harley, and Charleston Carriage Horse Advocates, LLC respectfully move this Court for a forty-five (45) day extension of time until April 20, 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 March 6, 2023.
2. The undersigned counsel respectfully requests additional time for the Brief of the Respondents on the ground that Respondents' counsel requires additional time because of trial workload and longstanding out-of-the-country travel plans for which counsel has lower court protection.
3. The undersigned has consulted with counsel for the Appellant, Charleston Carriage Works, LLC, and obtained consent to this request.

WHEREFORE, the Respondents respectfully request to be allowed until April 20, 2023, by which to file and serve their Initial Brief of the Respondent.

Respectfully submitted,

/s/ Elizabeth J. Palmer
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/s/ Jenkins Mann
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CARRIAGE HORSE ADVOCATES AND ELLEN
HARLEY

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CERTIFICATE OF SERVICE

I certify that I have served a copy of *Respondents' Motion for Extension of Time* in accordance with Section (b)(2) of the South Carolina Supreme Court's Order in Appellate Case No. 2020-000447 RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules by emailing a copy of the same to the AIS email addresses on file for Thomas R. Goldstein, Esq. at tgoldstein@cobblaw.net, Joseph DuRant Thompson, III, Esq. at jthompson@hallboothsmith.com, Kathleen Spencer Craig Gill, Esq. at sgill@hallboothsmith.com, and Elizabeth J. Palmer, Esq. at ep@saxtonsump.com.

[Signature Page to Follow]

/s/ Jenkins Mann
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