

**THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

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Appeal from Charleston County  
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

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Circuit Court Cases No. 2019-CP-10-00846, -02131, and -02539

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Court of Appeals Case No. 2019-000903  
Opinion No. 5966 (S.C. Ct. App. filed February 1, 2023)

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City of Charleston,

Petitioner,

v.

City of North Charleston and Millbrook Plantation, LLC,

Respondents.

and

Millbrook Plantation, LLC

Plaintiff,

v.

City of Charleston,

Defendant.

and

City of Charleston,

Plaintiff,

v.

City of North Charleston and Millbrook Plantation, LLC

Defendants.

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**CITY OF CHARLESTON'S  
MOTION FOR AN EXTENSION OF TIME  
TO PETITION FOR A WRIT OF CERTIORARI**

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*\*Counsel identified on the following page*

**RECEIVED**  
**May 15 2023**  
**SC Court of Appeals**

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*Attorneys for the City of Charleston*

NOW COMES Petitioner, City of Charleston, by and through its undersigned counsel, on the grounds stated below, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and hereby moves for an extension of ten (10) days' time to file/serve its petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

The Court of Appeals denied Petitioner's timely petition for rehearing on April 14, 2023, making the deadline to file/serve a petition to this Court for a writ of certiorari today, Monday, May 15, 2023, pursuant to Rule 242(c), SCACR. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days, beyond today's date, to prepare Petitioner's petition seeking this Court's review of the Court of Appeals' decision via writ of certiorari, and the undersigned submits that there is good cause to allow the requested dispensation: It is in furtherance of the interests of justice; it will not work any undue prejudice upon any other party; and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Petitioner respectfully requests this Honorable Court grant it an extension of ten (10) days' time to file/serve its petition for a writ of certiorari. With the extension requested herein, the new deadline for filing/serving the petition for writ of certiorari would be Thursday, May 25, 2023, according to the undersigned's calculations. Further, Petitioners respectfully request that the Court hold the present deadline in abeyance until it acts upon this motion.

**<SIGNED ON THE FOLLOWIG PAGE>**

Respectfully submitted,

By: s/Russell G. Hines  
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May 15, 2023