

**RECEIVED**

**May 30 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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Appeal from Greenville County  
Greenville County Court of Common Pleas  
Hon. Judge Alex Kinlaw, Jr.

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2023-000025

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George C. Hassiotis and Constantinon  
Hassiotis,.....Appellants,

Versus

The City of Greenville, South  
Carolina,.....Respondent.

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**MOTION TO FILE APPELLANT’S INITIAL BRIEF AND DESIGNATION  
OUT OF TIME, AND FOR AN EXTENSION OF TIME TO FILE THE  
APPELLANT’S INITIAL BRIEF AND DESIGNATION OF MATTER FOR THE  
RECORD ON APPEAL**

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Scarlet B. Moore, #72534  
Attorney for Appellants  
P.O. Box 17615  
Greenville, S.C. 29606  
(864) 214-5805  
(864) 752-0930 (FAX)

May 30, 2023

**NOW INTO COURT**, come the Appellants who move this Honorable Court for an Order permitting the Appellants to file the Initial Brief and Designation of Matter for the Record on Appeal out-of-time, and for an Order granting an extension of time to file the Appellant's Initial Brief and Designation of Matter for the Record on Appeal, for the following reasons, to wit:

Counsel needs additional time to complete the initial filings until Friday, June 9, 2023, which is a request for a ten (10)-day extension. In addition to counsel's court commitments since the entry of the last order for extension, counsel currently has multiple appellate briefs pending stemming from trial matters. Preparation of the initial brief and designation in this matter has taken more time than counsel had anticipated. As counsel was not trial counsel, additional time is required to review the record in this case, including the trial exhibits. Lastly, the Appellants submit that this case is not an expedited appeal, as it is an appeal from a common pleas non-jury trial regarding zoning in downtown Greenville.

**WHEREFORE**, the Appellants pray that this Honorable Court will grant an extension to make the initial filings in this appeal until Friday, June 9, 2023.

Respectfully Submitted,

s/Scarlet B. Moore

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**CERTIFICATE OF SERVICE**

I certify that on this date, May 30, 2023, I have served the Appellant’s Motion to File the Initial Brief and Designation of Matter Out of Time and for an Extension of Time to File the Initial Brief and Designation of Matter for the Record on Appeal on opposing counsel to their respective **E-MAIL** address, pursuant to the Order of the Supreme Court Appellate Case No. 2020-000447(g)(3).

Clark Price, [cprice@roecassidy.com](mailto:cprice@roecassidy.com)  
Luke Burke, [lburke@bannisterwyatt.com](mailto:lburke@bannisterwyatt.com)  
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Respectfully Submitted,

s/Scarlet B. Moore

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Greenville, South Carolina  
May 30 2023

**SCARLET B. MOORE, ESQ.**

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Jenny Abbott Kitchings  
Clerk, The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, S.C. 29211

**RE: Hassiotis v. The City of Greenville, Appellate Case No. 2023-000025**

Dear Madam Clerk,

Enclosed please find the Appellants George C. Hassiotis and Constantinon Hassiotis' Motion to File the Initial Brief and Designation of Matter for the Record on Appeal Out of time, and for Extension of Time to File the Appellant's Initial Brief and Designation of Matter for the Record on Appeal. Additionally, I have included a certificate of service, and a check for the filing costs.

Please let me know if you have questions regarding the enclosed. With kind regards, I remain

Very Truly Yours,

s/Scarlet B. Moore

Scarlet B. Moore, Esq.  
Counsel for Appellant

SBM/s

Cc: Bruce W. Bannister, Esq.  
Luke Burke, Esq.  
Vincent C. Price, Esq.