

From: [Leslie Lenhardt](#)
To: [Court Of Appeals Filings](#)
Cc: [William A. Neinast](#); [Anne R. Culbreath](#); [R. Taylor Speer](#); [Swent, William B.](#); [Andrew N. Price](#); [Amy Armstrong](#)
Subject: Citizens for Quality Rural Living v. LyonJay & GCPC - River Preserve Appeal - Respondent Planning Commission
Date: Wednesday, May 31, 2023 1:47:37 PM
Attachments: [image001.png](#)
[cover for motion for extension.pdf](#)
[motion for extension reply brief.pdf](#)
[Proof of Service reply brief extension.docx.pdf](#)
[email service.pdf](#)

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Please find attached for filing Appellant's Motion for Extension for filing Appellant's Reply Brief in the above-referenced matter, along with proof of service. I am sending the filing fee via U.S. Mail. Thank you,
Leslie

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Leslie Lenhardt
Senior Managing Attorney
S.C. Environmental Law Project
510 Live Oak Drive
Mount Pleasant, SC 29464
Phone: (843) 527-0078
leslie@scelp.org

On Wed, May 31, 2023, at 12:55 PM, Swent, William B. wrote:

Granted.

I take this further opportunity to point out—as I have in various other instances of delay—that time is of the essence to my client. The stay that has been imposed by virtue of this appeal has precluded my client from acquiring the subject property. During the pendency of the appeal interest rates have escalated substantially and deposits have been forfeited, such that my client has suffered significant losses on account of the mere passage of time. I concede the request for added time because it seems futile to oppose, yet my client fully intends to pursue the losses caused by the appeal and exacerbated by two requests for more time. This email is a further effort to mitigate by emphasizing that added time leads to added damages.

William Swent
Partner
Fox Rothschild LLP
2 W. Washington St.
Suite 1100
Greenville, SC 29601-2784
(864) 751-7605 - direct
(864) 751-7800 - fax
WSwent@foxrothschild.com
www.foxrothschild.com

From: Leslie Lenhardt <leslie@scelp.org>
Sent: May 31, 2023 12:37 PM
To: Swent, William B. <WSwent@foxrothschild.com>; Andrew N. Price <anprice@wjclaw.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: Neinast, William A. <WNeinast@foxrothschild.com>; Anne R. Culbreath <arculbreath@wjclaw.com>; Speer, R. Taylor <TSpeer@foxrothschild.com>; Michael Martinez <mike@scelp.org>
Subject: Re: [EXT] Re: Citizens for Quality Rural Living v. LyonJay & GCPC - River Preserve Appeal - Respondent Planning Commission

June 12.

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Leslie Lenhardt
Senior Managing Attorney

S.C. Environmental Law Project
510 Live Oak Drive
Mount Pleasant, SC 29464
Phone: (843) 527-0078
leslie@scelp.org

On Wed, May 31, 2023, at 12:34 PM, Swent, William B. wrote:

What is the proposed, extended deadline?

William Swent

Partner

Fox Rothschild LLP

2 W. Washington St.
Suite 1100
Greenville, SC 29601-2784
(864) 751-7605 - direct
(864) 751-7800 - fax
WSwent@foxrothschild.com
www.foxrothschild.com

From: Leslie Lenhardt <leslie@scelp.org>
Sent: May 30, 2023 12:03 PM
To: Andrew N. Price <anprice@wjcbllaw.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: Neinast, William A. <WNeinast@foxrothschild.com>; Anne R. Culbreath <arculbreath@wjcbllaw.com>; Swent, William B. <WSwent@foxrothschild.com>; Speer, R. Taylor <TSpeer@foxrothschild.com>; Michael Martinez <mike@scelp.org>
Subject: [EXT] Re: Citizens for Quality Rural Living v. LyonJay & GCPC - River Preserve Appeal - Respondent Planning Commission

Dear counsel,

I am writing to seek a ten-day extension for filing Appellant's reply brief in the above-referenced matter. As you know, Mike Martinez recently departed SCEL, and due to a death in the family I have been unable to prepare a reply brief in this case. Please let me know if you have an objection to one ten-day extension.

Thank you,
Leslie

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Leslie Lenhardt
Senior Managing Attorney
S.C. Environmental Law Project
510 Live Oak Drive
Mount Pleasant, SC 29464
Phone: (843) 527-0078
leslie@scelp.org

On Mon, May 22, 2023, at 10:56 PM, Andrew N. Price wrote:

Good evening Ms. Kitchings,

Please find attached, and hereby filed and served on all counsel of record, Respondent Greenville County Planning Commission's Initial Brief, Designation of Matter, Rule 209 Certification, and a Certificate of Service in the above-referenced matter. Thank you for your attention to this matter. Please do not hesitate to let me know if there is anything further we can do to assist the Court.

Thank you,



Andrew N. Price

Attorney

email: anprice@wjcbllaw.com
phone: 864.672.3714
325 Rocky Slope Rd., Suite 201
Greenville, South Carolina 29607

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Attachments:

- image001.png
- Certificate of Service.pdf
- Designation of Matter and Cert.pdf
- Initial Brief of Resp Planning Commission.pdf

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