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**Jun 06 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Honorable Benjamin H. Culbertson, Circuit Court Judge

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Civil Action No.: 2018-CP-26-6424  
Appellate Case No. 2021-000393

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South Carolina Electric & Gas Company, Respondent,

v.

Barbara Todd, Landowner,

and

Public Service Authority; Pitch Landing, LLC; and David O. Heniford, Jr., Other Condemnees,

of which Pitch Landing, LLC is the Appellant.

AND

South Carolina Electric & Gas Company, Respondent,

v.

Pitch Landing, LLC, Appellant,

and

South Carolina Public Authority; Horry Telephone Cooperative; Grand Strand Water and Sewer Authority; Coastal Carolina National Bank; Billy J. McDowell & Sally R. McDowell; Bobby D. McDowell, Other Condemnees.

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**MOTION FOR EXTENSION TO FILE PETITION FOR REAHRING**

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Appellant hereby requests a ten (10) day extension of time to file a Petition for Rehearing for good cause shown.

The Petition for Rehearing is due June 8, 2023 and if this request is granted, the Petition for Rehearing will be due on June 18, 2023. Respondent submits that this Motion for Extension is not intended for purposes of delay.

Respectfully submitted,

**BELLAMY, RUTENBERG, COPELAND,  
EPPS, GRAVELY & BOWERS, P.A.**

s/Robert S. Shelton  
Robert S. Shelton, SCB# 68543  
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*Attorney for Appellant Pitch Landing, LLC*

**NEILL LAW FIRM, PA**

s/Mark D. Neill  
Mark D. Neill, Esq., SCB# 14273  
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*Attorney for Appellant Pitch Landing, LLC*

Myrtle Beach, South Carolina  
Dated: June 6, 2023

Other Counsel of Record:

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**PROOF OF SERVICE**

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I certify that I have served Appellant's Motion for Extension of Time to File Petition for Rehearing by depositing a copy of it in the United States mail, postage prepaid, on June 6, 2023, addressed to its attorney of record, Gregory M. Alford, Esq., Alford Law Firm, LLC, Post Office Drawer 8008, Hilton Head Island, SC 29938.

**BELLAMY, RUTENBERG, COPELAND,  
EPPS, GRAVELY & BOWERS, P.A.**

s/Robert S. Shelton

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June 6, 2023

VIA EMAIL ONLY: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Honorable Jenny Abbott Kitchings  
Clerk of Court, Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

RECEIVED  
Jun 06 2023  
SC Court of Appeals

Re: South Carolina Electric & Gas Company v. Barbara Todd  
and  
South Carolina Electric & Gas Company v. Pitch Landing, LLC, et al  
Appellate Case No.: 2021-000393

Dear Ms. Kitchings:

Enclosed for filing is Appellant's Motion for Extension to File Petition for Rehearing and Proof of Service in the above referenced matter.

According to my calculations, should this Motion be granted, the Appellant's Petition for Rehearing will be due on or before June 18, 2023. Please let me know immediately if my calculations are incorrect.

Please do not hesitate to contact me should you have any questions.

With kindest regards, I am

Yours very truly,  
BELLAMY, RUTENBERG, COPELAND,  
EPPS, GRAVELY & BOWERS, P.A.

s/Robert S. Shelton

Robert S. Shelton

RSS:nmr

June 6, 2023

Page 2

Enclosures as noted

cc: Client  
Gregory M. Alford, Esq. (*Via U.S. Mail and Email*)