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**Jun 22 2023**

**SC Court of Appeals**

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

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Appeal from Charleston County  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

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Case No. 2019-CP-10-01434  
Appellate Case No. 2023-000770  
Unpublished Opinion No. 2023-UP-005 (S.C. Ct. App., filed Jan. 4, 2023)

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David Abdo,

Petitioner,

v.

City of Charleston and Board of Zoning Appeals-Zoning,

Respondents.

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**SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE  
RETURN TO PETITION FOR WRIT OF CERTIORARI**

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*and*

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*Attorneys for Respondents*

NOW COME Respondents, City of Charleston and Board of Zoning Appeals-Zoning, by and through their 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 move for a second extension of ten (10) days' time to file/serve their return to petition for writ of certiorari.

Presently, by order of this court filed June 14, 2023, the deadline for the return to petition for writ of certiorari is June 22, 2023. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Respondents request ten (10) additional days, beyond today's date, to prepare their return to the petition for writ of certiorari, and the undersigned submits 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, Respondents respectfully request this Honorable Court grant them an extension of ten (10) days' time to file/serve their return to petition for writ of certiorari. With the extension requested herein, the new deadline for filing/serving their return to petition for writ of certiorari would be July 3, 2023, according to the undersigned's calculations. Further, Respondents respectfully request the Court hold this present deadline in abeyance until it acts upon this motion.

*[signature on next page]*

[Signature page for Second Motion for Extension of Time to File/Serve Return to Petition for Writ of Certiorari, Appellate Case No. 2023-000770]

Respectfully submitted,

By: s/Russell G. Hines  
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Charleston, South Carolina

June 22, 2023

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**PROOF OF SERVICE**

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*Attorneys for Respondents*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE RETURN TO PETITION FOR WRIT OF CERTIORARI** was served on June 22, 2023, on all parties to this matter via emailing (see attached) a copy of the same to the following:

Julia P. Copeland, Esquire  
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Respectfully submitted,  
CLEMENT RIVERS, LLP

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*Attorneys for Respondents*

Charleston, South Carolina

June 22, 2023

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Thursday, June 22, 2023 1:37 PM  
**To:** 'copelandj@charleston-sc.gov'; 'jmassalon@wmalawfirm.net';  
'csteichen@wmalawfirm.net'  
**Cc:** Hines, Russell; Justman, Aimee; Johnson, Wilbur; Russell, Karen  
**Subject:** Abdo v. City of Charleston (Sup. Ct. Case No. 2023-000770 ; Ct. App. Case No. 2019-001910) - CR 210598  
**Attachments:** Abdo 2nd Motion for Extension - return to petition for writ of cert.pdf

Enclosed please find Respondents' Second Motion for Extension of Time to File/Serve Return to Petition for Writ of Certiorari which will be filed today in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
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