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Jul 05 2023

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

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

2023-000025

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

Versus

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

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT’S INTIAL BRIEF AND
DESIGNATION OF MATTER FOR THE RECORD ON APPEAL**

**V. Clark Price
S.C. Bar No. 4567
Cole J. Good
S.C. Bar No. 106053
CASSIDY COATES PRICE
P.O. Box 10529
Greenville, SC 29603
864-349-2600
cprice@cassidycoates.com
ATTORNEYS FOR RESPONDENT THE CITY OF
GREENVILLE, SOUTH CAROLINA**

July 5, 2023

NOW INTO COURT, come the Respondent which moves this Honorable Court for an Order granting an extension of time to file the Respondent's Initial Reply 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 August 15, 2023. Preparation of the initial brief and designation in this matter has taken more time than counsel had anticipated, due to a trial for which counsel was preparing. Additional time is required for counsel to review the transcript in this case, including trial exhibits which counsel has not received but is obtaining from the Clerk of Court. Finally, Respondent submits that this case is not an expedited appeal, as it is an appeal from common pleas non-jury regarding zoning in downtown Greenville, South Carolina.

WHEREFORE, the Respondent prays that this Honorable Court will grant an extension to make the initial filings in this appeal until August 15, 2023.

Respectfully submitted,

/s V. Clark Price

V. Clark Price

S.C. Bar No. 4567

Cole J. Goode

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CERTIFICATE OF SERVICE

I certify that on this date, July 5, 2023, I have served Respondent’s Motion to File the Initial Response 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).

Scarlet B. Moore: scarlet28@msn.com
Luke Burke: lburke@bannisterwyatt.com
Bruce Bannister: bbannister@bannisterwyatt.com

SIGNATURE PAGE TO FOLLOW

Respectfully Submitted,

/s V. Clark Price

V. Clark Price

S.C. Bar No. 4567

Cole J. Goode

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ATTORNEYS FOR RESPONDENT THE CITY OF
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July 5, 2023.



V. Clark Price
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July 5, 2023

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

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SC Court of Appeals

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

Dear Madam Clerk,

Enclosed please find the Respondent, The City of Greenville's Motion for Extension of Time to File the Respondent'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 cost associated with this Motion.

Please let me know if you have any questions regarding the enclosed.

With kind regards, I am,

Sincerely,

CASSIDY COATES PRICE

s/ V. Clark Price

Counsel for the Respondent

Enclosures

cc: Scarlet B. Moore, Esq.
Bruce W. Bannister, Esq.
Luke Burke, Esq.