

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Honorable Benjamin H. Culbertson, Circuit Court Judge
Civil Action No.: 2018-CP-26-6424

Appellate Case No. 2021-000393

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.**

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S RETURN OF THE
PETITION FOR REHEARING

Pursuant to Rules 240 and 263 of the South Carolina Appellate Court Rules, Respondent South Carolina Electric & Gas Company n/k/a Dominion Energy South Carolina, moves this Court for an order granting an extension of time for Respondent to serve and file Respondent's Return to Appellant's Request for Rehearing. Due to the receipt of the Court's letter falling on a Thursday and the Fourth of July Holiday being midweek of the next week, Counsel has had insufficient time to prepare and finalize the return. Respondent respectfully requests an additional 10 days from service of the Court's June 29, 2023 letter to file and serve Respondent's return of the Petition for Rehearing. This is Respondent's first request for an extension to file and service Respondent's Return.

WE SO MOVE:

ALFORD LAW FIRM, LLC

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South Carolina Electric & Gas
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South Carolina

Hilton Head, South Carolina
July 7, 2023