

RECEIVED

Sep 13 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

George M. McFaddin, Jr., Circuit Judge

Appellate Case No. 2023-001116

Mare Baracco,.....Appellant,

v.

Charleston Area Convention and Visitors Bureau,.....Respondents.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE APPELLANT'S
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN
RECORD ON APPEAL

Taylor M. Smith IV
S.C. Bar No. 101584
Harrison, Radeker & Smith, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant

Appellant hereby moves pursuant to Rule 263(b), SCACR, for a 30-day extension of the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. Appellant's counsel has recently begun his second semester teaching part-time at the University of South Carolina and completed two criminal trials (finishing one yesterday) and must also continue preparation for oral argument before the Fourth Circuit United States Court of Appeals on September 19, 2023.
2. On August 14, 2023, the undersigned counsel for Appellant received the transcript of the proceedings below in this appeal.
3. Appellant's initial brief and designation of matter are presently due Wednesday, September 13, 2023. If the request is granted, Appellant's initial brief and designation of matter to be included in the record on appeal will be due on October 13, 2023.
4. This is the first extension Appellant has requested in this appeal.
5. Respondent has consented to this proposed extension of time to serve the initial brief and designation of matter to be included in the record on appeal.
6. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Appellant prays for an order extending the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal by 30 days, to October 13, 2023.

September 13, 2023

Respectfully submitted,

/s/ Taylor Smith
Taylor M. Smith IV
S.C. Bar No. 101584
Harrison, Radeker & Smith, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant

RECEIVED

Sep 13 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

George M. McFaddin, Jr., Circuit Judge

Appellate Case No. 2023-001116

Mare Baracco,.....Appellant,

v.

Charleston Area Convention and Visitors Bureau,.....Respondents.

PROOF OF SERVICE MOTION FOR EXTENSION OF TIME TO SERVE AND
FILE INITIAL BRIEF AND DESIGNATION OF MATTER

I certify that I served the appellant’s foregoing motion for an extension of time
in this case by providing a copy of it by email to opposing counsel at the email
address(es) shown below and on the date shown below:

Rob Tyson, Jr., Esquire
rtyson@robinsongray.com

Respectfully submitted,

/s/ Taylor Smith
Taylor M. Smith IV
S.C. Bar No. 101584
Harrison, Radeker & Smith, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
taylor@harrisonfirm.com
Attorneys for Appellant

September 13, 2023