

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

**Oct 31 2023**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

**SC Court of Appeals**

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 OUT OF TIME  
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE  
INCLUDED IN RECORD ON APPEAL

Appellant hereby moves pursuant to Rule 240 and 263(b), SCACR, requesting the Court accept late service of this motion (and Appellant's initial brief and matter to be designation to be included in the record on appeal) and for a 18-day extension of the time from the date it was previously due 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 and leave to file this motion out of time, as the following shows:

1. Appellant's brief and designation of matter was due for filing and service on October 13, 2023.
2. The undersigned counsel for Appellant has recently experienced muscle spasms in his arms which has result in discomfort while sitting upright or typing. As a result of his injury, the undersigned was unable to meet several deadlines.
3. Regrettably, the undersigned did not ask for an extension during the time of these spasms.
4. Appellant's brief and designation of matter was due Wednesday, October 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 31, 2023, today.
5. This is the second extension Appellant has requested in this 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 18 days, to October 31, 2023.

Respectfully submitted,

/s/ Taylor Smith  
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October 31, 2023