



McCULLOUGH • KHAN, LLC  
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July 24, 2013

**VIA US MAIL AND FACSIMILE (803-734-1496)**

Jenny Abbott Kitchings  
Clerk of Court  
1015 Sumter St.  
Columbia, SC 29201

RECEIVED

JUL 24 2013

SC Court of Appeals

RE: Grand Bees Development, LLC (Respondent) v. South Carolina Department of Health and Environmental Control and County of Charleston (Appellants)

Appellate Case No. 2013-001141

**MEDICAL EMERGENCY** – Motion for Thirty (30) Day Extension to File Initial Brief of Respondent in Response to Initial Brief of Appellant Charleston County

Dear Clerk:

Jamie A. Khan, Esq., the senior partner with my firm responsible for the above-captioned appeal, unfortunately had to be rushed to the hospital yesterday afternoon. Right now he is at MUSC recovering and undergoing various tests. At this point, we are unsure of his prognosis, and we are closely monitoring the situation.

Our firm represents Respondent Grand Bees Development, LLC, and our Initial Brief in response to Appellant Charleston County's Initial Brief, by our calculations, is due today. Given the circumstances, we have been in touch with counsel for Charleston County, and they have graciously consented to a thirty (30) day extension to file our Initial Brief.

Therefore, **I respectfully move and request that this Honorable Court grant Respondent Grand Bees Development, LLC a thirty (30) day extension to file its Initial Brief in Response to the Initial Brief of Charleston County.** By my calculation, this would extend the due date to Friday, August 23, 2013.

I will deposit the twenty five (\$25) dollar filing fee in the mail today.

Finally, if you would please e-mail me a confirmation of your receipt and acceptance of our motion for extension, I would most appreciate that. My email address is ross@mklawsc.com.

Thank you very much for your attention to this matter. If you need anything else from me, please do not hesitate to reach me at 843-937-0400 or at the aforementioned e-mail address.

With kind regards,

McCULLOUGH KHAN, LLC

A handwritten signature in black ink, appearing to read 'Ross A. Appel', with a long, sweeping horizontal line extending to the right.

Ross A. Appel, Esq.

RAA/etp

Cc: Joseph Dawson, III, Esq. (via e-mail: [jdawson@charlestoncounty.org](mailto:jdawson@charlestoncounty.org))  
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