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Nov 27 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Circuit Court

George M. McFaddin, Jr., Circuit Court Judge

Case No.: 2021-CP-10-02999
Appellate Case No. 2023-001116

Mare Baracco.....Appellant,

v.

Charleston Area Convention and Visitors Bureau.....Respondent.

**MOTION FOR EXTENSION OF TIME
TO FILE RESPONDENT’S INITIAL BRIEF**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the undersigned, as attorneys for the Respondent Charleston Area Convention and Visitors Bureau hereby moves for a thirty (30) day extension of time to file and serve Respondent’s Initial Brief.

The grounds for this motion are counsel for Respondent needs additional time to prepare Respondent’s Initial Brief. Due to other deadlines and work obligations, the current deadline of November 30, 2023 creates a difficult schedule for them to give this important matter the proper time and attention necessary.

With the requested 30-day extension, Respondent’s Initial Brief would be due on or before January 2, 2023. This is Respondent’s first request for an extension of this deadline.

ROBINSON GRAY STEPP & LAFFITTE, LLC

By: s/Robert E. Tyson, Jr.

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Attorneys for Respondent

Columbia, South Carolina
November 27, 2023

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PROOF OF SERVICE

I certify that I have caused the **MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT’S INITIAL BRIEF** to be served on Appellant by electronic mail on November 27, 2023, addressed to their attorney of record at the following address:

Taylor M. Smith IV, Esquire
Harrison, Radeker & Smith, PA
PO Box 50143
Columbia, SC 29250
taylor@harrisonfirm.com

Copy of service email is attached herewith, as required.

I further certify that all parties required by Rule to be served have been served.

(Signature Page Follows)

s/Robert E. Tyson, Jr.

Robert E. Tyson, Jr., SC Bar No. 10820

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November 27, 2023

From: [Cynthia D. Nygord](#)
To: taylor@harrisonfirm.com
Cc: [Rob Tyson](#); [La"Jessica Stringfellow](#); [Cynthia D. Nygord](#); [Emma McCabe](#)
Subject: Baracco v. CACVB - Motion for Extension of Time to File Respondent's Initial Brief
Date: Monday, November 27, 2023 10:33:43 AM
Attachments: [image001.png](#)
[Motion for Extension of Time to File Respondent's Initial Brief and Proof of Service - for Filing.pdf](#)

Dear Counsel:

Attached herewith for service upon you is the Motion for Extension of Time to File Respondent's Initial Brief and Proof of Service for the same, which is being filed with the SC Court of Appeals this morning.

A copy of this email will be filed with the Proof of Service.

With kindest regards,
Cyndi Nygord



CYNDI NYGORD PARALEGAL

DIRECT 803.231.7845

VCARD

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