

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Bentley D. Price

C.A. No.: 2022-CP-23-04704

Marcelo Torricos, as Trustee of the John W.
Beeson Irrevocable Trust II FBO James H.
Beeson dated August 5, 2021 Plaintiff/Respondent,

v.

Greenville County Planning Commission Defendant/Appellant.

**CONSENT MOTION FOR SECOND EXTENSION OF TIME FOR APPELLANT
TO FILE INITIAL REPLY BRIEF**

The Appellant’s initial reply brief is currently due on January 3, 2024. Due to the recent holidays and ongoing settlement discussions, Appellant, with the consent of Respondent, respectfully requests a second 10-day extension of time in which to file its initial reply brief, which would result in a new deadline of January 16, 2024. Appellant asks that its current filing deadlines be stayed pending resolution of this motion.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ Sarah P. Spruill

Boyd B. Nicholson, Jr., S.C. Bar No. 65387

nnicholson@hsblawfirm.com

Sarah P. Spruill, S.C. Bar No. 68337

sspruill@hsblawfirm.com

P.O. Box 2048 (29602-2048)

ONE North Main, 2nd Floor

Greenville, SC 29601

Telephone: 864.240.3200

Attorneys for Appellant

January 3, 2024

RECEIVED

Jan 02 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Bentley D. Price

C.A. No.: 2022-CP-23-04704

Marcelo Torricos, as Trustee of the John W.
Beeson Irrevocable Trust II FBO James H.
Beeson dated August 5, 2021 Plaintiff/Respondent,


v.

Greenville County Planning Commission Defendant/Appellant.

PROOF OF SERVICE

I certify that I have served *Consent Motion for Second Extension of Time for Appellants to File Initial Reply Brief* on counsel of record on January 2, 2024, by electronic mail only to the following:

Bruce W. Bannister, Esq.
Luke Anthony Burke, Esq.
Marcelo Torricos III, Esq.
Bannister, Wyatt & Stalvey, LLC
24 Cleveland Street, Ste. 100 (29601)
P.O. Box 10007
Greenville, SC 29603
bbannister@bannisterwyatt.com
lburke@bannisterwyatt.com
mtorricos@bannisterwyatt.com


Stacey Carberry, Legal Assistant
HAYNSWORTH SINKLER BOYD, P.A.
864.240.3223

**HAYNSWORTH
SINKLER BOYD**

HAYNSWORTH SINKLER BOYD, P.A.
ONE NORTH MAIN STREET, 2ND FLOOR
P.O. BOX 2048 (29602)
GREENVILLE, SOUTH CAROLINA 29601
MAIN 864.240.3200
FAX 864.240.3300
www.hsblawfirm.com

SARAH P. SPRUILL
DIRECT 864.240.3220
sspruill@hsblawfirm.com

January 2, 2024

VIA EMAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

Jan 02 2024

SC Court of Appeals

Re: *Marcelo Torricos, as Trustee of the John W. Beeson Irrevocable Trust II FBO James H. Beeson dated August 5, 2021 v. The Greenville County Planning Commission*
Appellate Case No. 2023-000699

Dear Ms. Kitchings:

This firm represents the Appellant in the above-captioned matter. Enclosed for filing, please find a *Consent Motion for Second Extension of Time for Appellant to File Initial Reply Brief* together with our Proof of Service for the same. Also enclosed is our firm's check to cover the cost of the filing fee (w/ mailed copy).

Please note service on counsel of record by copy of this letter. If you have any questions, please give me a call. Thank you for your assistance in this matter.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



Sarah P. Spruill

SPS/sac

Enclosure

cc: Bruce W. Bannister, Esq. (bbannister@bannisterwyatt.com)
Luke Anthony Burke, Esq. (lburke@bannisterwyatt.com)
Marcelo Torricos III, Esq. (mtorricos@bannisterwyatt.com)
Nick Nicholson (nnicholson@hsblawfirm.com)