

**RECEIVED**

**Jul 09 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Jennifer B. McCoy, Circuit Court Judge  
Charleston County

---

Appellate Case No.: 2024-000768  
Trial Court Case No.: 2023-CP-10-02575

---

Martin Alloy, Michael Laughlin, and Henry Grimball,

Appellants Below,

v.

City of Charleston, South Carolina Board of Architectural  
Review – Small and 117 SOB Project, LLC,

Respondents,

of whom Martin Alloy is the Appellant.

---

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

---

COMES NOW Appellant Martin Alloy (“Appellant”), by and through his undersigned counsel, and hereby requests an extension of time to file Appellant’s Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above-referenced appeal. As grounds for this Motion, Appellant states as follows:

1. The current deadline for filing Appellant’s Initial Brief and Designation of Matter to be Included in the Record on Appeal is Thursday, July 11, 2024.

2. Due to pending obligations relating to other matters, including a five (5) day jury trial, the undersigned counsel for Appellant anticipates that additional time is needed to prepare and file Appellant's Initial Brief and Designation of Matter.

3. Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellant respectfully requests a thirty (30) days extension of the deadline of filing and serving Appellant's Initial Brief and Designation of Matter.

4. With the extension of time requested herein, Appellant's Initial Brief and Designation of Matter will be due on Monday, August 12, 2024.

5. The deadline for filing Appellant's Initial Brief and Designation of Matter has not been previously extended.

6. For these reasons, Appellant Martin Alloy respectfully requests a 30-day extension of time to allow Appellant to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

By: *s/Ellis R. Lesemann*

Ellis R. Lesemann, Esq. (S.C. Bar No. 15315)

[erl@lalawsc.com](mailto:erl@lalawsc.com)

Michelle A. Stewart, Esq. (S.C. Bar No. 100685)

[mas@lalawsc.com](mailto:mas@lalawsc.com)

LESEMANN & ASSOCIATES LLC

418 King Street, Suite 301

Charleston, SC 29403

Phone: (843) 724-5155

July 9, 2024

Charleston, South Carolina

*Attorneys for Appellant*

**RECEIVED**

**Jul 09 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Jennifer B. McCoy, Circuit Court Judge  
Charleston County

---

Appellate Case No.: 2024-000768  
Trial Court Case No.: 2023-CP-10-02575

---

Martin Alloy, Michael Laughlin, and Henry Grimball,

Appellants Below,

v.

City of Charleston, South Carolina Board of Architectural  
Review – Small and 117 SOB Project, LLC,

Respondents,

of whom Martin Alloy is the Appellant.

---

**PROOF OF SERVICE**

---

I certify on this date that I have served a copy of Appellant Martin Alloy's Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal to the following counsel of record via electronic mail dated July 9, 2024, at the following addresses:

Brian A. Hellman, Esq.  
[bh@hellmanyates.com](mailto:bh@hellmanyates.com)  
Jason S. Smith, Esq.  
[js@hellmanyates.com](mailto:js@hellmanyates.com)  
HELLMAN & YATES, PA  
105 Broad Street, Third Floor  
Charleston, SC 29401

*Attorneys for Respondent 117 SOB Project, LLC*

*and*

Timothy A. Domin, Esq.  
[tdomin@clawsonandstaubes.com](mailto:tdomin@clawsonandstaubes.com)  
CLAWSON & STAUBES, LLC  
126 Seven Farms Drive, Suite 200  
Charleston, SC 29492-8144

*Attorney for Respondent City of Charleston  
Board of Architectural Review – Small*

Respectfully submitted,

By: s/Michelle A. Stewart  
Ellis R. Lesemann, Esq. (S.C. Bar No. 15315)  
[erl@lalawsc.com](mailto:erl@lalawsc.com)  
Michelle A. Stewart, Esq. (S.C. Bar No. 100685)  
[mas@lalawsc.com](mailto:mas@lalawsc.com)  
LESEMANN & ASSOCIATES LLC  
418 King Street, Suite 301  
Charleston, SC 29403  
Phone: (843) 724-5155

July 9, 2024  
Charleston, South Carolina

*Attorneys for Appellant*