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**Aug 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 G.D. Morgan, Judge

Appellate Case No: 2024-000727

Letchworth Properties, LLC.....Appellant

v.

City of Greer and City of Greer Board of Zoning Appeals..... Respondents

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**MOTION FOR EXTENSION OF TIME WITHIN WHICH  
TO SERVE AND FILE THE INITIAL BRIEF OF RESPONDENTS**

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Respondents, City of Greer and City of Greer Board of Zoning Appeals, through their undersigned counsel, would respectfully show unto this Court as follows:

The Respondent’s Brief is due to be served and filed no later than August 8, 2024. However, due to counsel’s workload and family medical issue, counsel requests an extension of time in which to serve and file the Respondent’s Brief for thirty (30) days.

Respondent’s request for an extension is not intended for purposes of delay.

WHEREFORE, Respondents pray that this Court grant their Motion for Extension of Time within which to serve and file the Respondent’s Brief and Designation of Matter in this case for an additional thirty (30) days from August 8, 2024 and for such other relief as this Court may deem just and proper.

DUGGAN & HUGHES, LLC

s/Daniel R. Hughes

DANIEL R. HUGHES (SC Bar #72547)

457-B Pennsylvania Avenue

P. O. Box 449

Greer, SC 29652-0449

Telephone: (864) 334-2500

Facsimile: (864) 879-0149

ATTORNEYS FOR RESPONDENTS

Dated: August 2, 2024  
Greer, South Carolina

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Appeals..... Respondents

**RESPONDENTS' PROOF OF SERVICE**

I certify that I have served Respondents' Motion for Extension of Time on Appellant, electronically and by depositing a copy of it in the United States Mail, postage prepaid to the following:

J. Marshall Lawson  
The Lawson Law Firm, LLC  
4329 Kilbourne Road  
Columbia, SC 29206  
[marshall@lawsonlawsc.com](mailto:marshall@lawsonlawsc.com)  
Attorney for Appellant

s/Daniel R. Hughes  
Daniel R. Hughes (SC Bar #72547)  
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Facsimile: (864) 879-0149  
Attorneys for Respondents

Dated: August 2, 2024  
Greer, South Carolina

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**SC Court of Appeals**

**DUGGAN & HUGHES, LLC**  
ATTORNEYS AND COUNSELORS AT LAW

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August 1, 2024

**Via Email to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
P.O. Box 11629  
Columbia, SC 29211

**RE: Letchworth Properties, LLC v. City of Greer et al.**  
**Appellate Case No. 2024-000727**

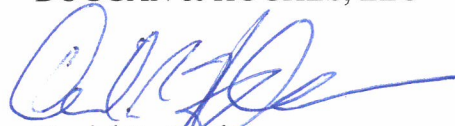
Dear Sir or Madam:

Enclosed herewith please find a Motion for Extension of Time for Respondents, City of Greer and City of Greer Board of Zoning Appeals, to file their Initial Brief along with the filing fee of \$50.00, along with a Proof of Service to Appellant's counsel.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

DUGGAN & HUGHES, LLC



Daniel R. Hughes

[dhughes@dugganhughes.com](mailto:dhughes@dugganhughes.com)

DRH/tab  
Enclosure (Motion and Proof of Service)