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IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

\_\_\_\_\_  
Appeal from Charleston County  
Court of Common Pleas

AUG 14 2024

SC Court of Appeals

Paul M. Burch, Circuit Court Judge

\_\_\_\_\_  
Appellate Case No. 2024-000814  
\_\_\_\_\_

Folly East Indian Co., LLC,.....Appellant,

v.

City of Folly Beach.....Respondent,

and

Save Folly's Future.....Intervenor.

\_\_\_\_\_  
**INTERVENOR'S PETITION FOR EXTENSION OF TIME TO FILE AND SERVE  
INITIAL BRIEF AND DESIGNATION OF MATTER**  
\_\_\_\_\_

Pursuant to the South Carolina Court of Appeals Rules, Intervenor Save Folly's Future, ("Intervenor"), by and through its undersigned counsel, hereby moves the Court for an order granting Intervenor a thirty (30) day extension of time, until September 16, 2024, in which to file and serve Intervenor's Initial Brief and Designation of Matter. Intervenor would submit that this extension is necessary due to counsel's current case load. The deadline has not previously been extended.

Respectfully Submitted,

Law Office of Robert M. Turkewitz, LLC

*s/Robert M. Turkewitz*

S.C. Bar No. 11589

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Charleston, SC 29407

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August 12, 2024  
Charleston, South Carolina

Attorney for Intervenor

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IN THE COURT OF APPEALS

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Folly East Indian Co., LLC,.....Appellant,

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City of Folly Beach.....Respondent,

and

Save Folly's Future.....Intervenor.

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**PROOF OF SERVICE**

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I do hereby certify that on August 12, 2024, I have served all counsel in this action with a copy of *Intervenor's Petition for Extension of Time to File and Serve Initial Brief and*

*Designation of Matter* via e-filing to the following email addresses:

Alice F. Paylor  
Bijan K. Ghom  
Saxton & Stump, LLC  
151 Meeting Street, Suite 400  
Charleston, SC 29401  
(843) 414-5080  
afp@saxtonstump.com  
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ATTORNEYS FOR APPELLANT

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(843) 834-2390  
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ATTORNEY FOR RESPONDENT

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*Admitted to practice in South Carolina and New York*

August 12, 2024

**RECEIVED**

**VIA E-FILING AND U.S. MAIL**

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

AUG 14 2024  
SC Court of Appeals

Re: Folly East Indian Co., LLC vs. City of Folly Beach  
Appellate Case No.: 2024-000814

Dear Ms. Kitchings:

Enclosed please find a check in the amount of \$50.00 to cover the filing fee for Intervenor's Petition for Extension of Time to File and Serve the Initial Brief and Designation of Matter in connection with the above named matter. The Petition has been e-filed.

Thank you, and please let me know if you have any questions.

Respectfully Submitted,

*s/Robert M. Turkewitz*

Encl: As described

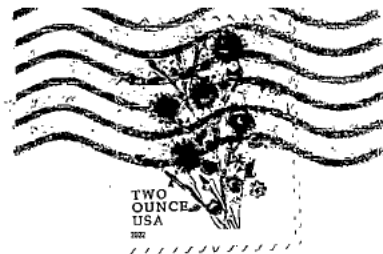
cc: Alice Paylor, Esquire (via e-mail)  
Bijan K. Ghom, Esquire (via e-mail)  
Joseph C. Wilson, IV, Esquire (via e-mail)



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CHARLESTON SC 294

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