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**Sep 25 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM BEAUFORT COUNTY  
FOURTEENTH JUDICIAL CIRCUIT  
THE HONORABLE R. KEITH KELLY  
Trial Court Case Number: 2022-CP-07-01598

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APPELLATE CASE NUMBER: 2024-000759

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James Ware, Alisa Ware, Jason DuBose,  
and Amanda DuBose,

Appellants,

vs.

Beaufort County Zoning Board of Appeals and  
Robert Merchant, in his Capacity as  
Planning Director of Beaufort County,

Respondents.

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**APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS'  
INITIAL BRIEF AND DESIGNATION OF MATTER**

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The Appellants, pursuant to Rule 240, SCACR, respectfully move this Court for a thirty (30) day extension of the deadline for filing and serving their Initial Brief and Designation of Matter to be included in the Record on Appeal in this case. This is the second requested extension. Respondents' Counsel has consented to the request. The requested extended deadline would be October 25, 2024. As the basis for this Motion, Counsel for

Appellants advises the Court that Appellants' Counsel, a sole practitioner, has been ill for several days and cannot complete the Initial Brief at this moment.

I SO MOVE.

*s/Thomas C. Taylor*  
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ATTORNEY FOR APPELLANTS

Bluffton, South Carolina  
September 25, 2024

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PROOF OF SERVICE

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I hereby certify that this law firm represents the Appellants in the above-captioned matter and that on the date below, in Bluffton, South Carolina, I served a copy of the forgoing on the following person via U.S. Mail, and electronic mail to his AIS E-mail address:

**Documents Served:** APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE  
APPELLANTS' INITIAL BRIEF AND DESIGNATION OF MATTER

**Party Served:**

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Post Office Box 1149

Columbia, SC 29202  
[danny@crowelafave.com](mailto:danny@crowelafave.com)  
ATTORNEY FOR BEAUFORT COUNTY  
AND ROBERT MERCHANT



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Bluffton, South Carolina  
September 25, 2024

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**THOMAS C. TAYLOR, LLC**

ADMITTED TO THE UNITED STATES  
SUPREME COURT BAR

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September 25, 2024

**Via First Class U.S. Mail and E-Mail Transmittal to: ctappfilings@sccourts.org**

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


**Re: James Ware v. Beaufort County Zoning Board of Appeals;  
Appellate Case No. 2024-000759; Appellants' Motion for Thirty (30) Day  
Extension to File Initial Brief and DOM**

Dear Ms. Kitchings:

On behalf of the Appellants, I am enclosing herein for filing, a Motion for a second thirty (30) day extension of time to file the Appellants' Initial Brief and Designation of Matter, a Proof of Service, and a check for \$50 as the filing fee. I have been under the weather a couple of days and cannot complete the brief by today's date. Mr. Crowe, on behalf of the Respondents, has graciously consented to the extension.

The requested extension of time is until October 25, 2024. This is the second request for an extension, and I do not anticipate further extensions will be necessary barring unforeseen circumstances. Thank you very much for your and your staff's professionalism and assistance. Please let me know if you require any additional information.

Cordially yours,  
**LAW OFFICE OF THOMAS C. TAYLOR, LLC**

  
Thomas C. Taylor

TCT/dpt  
Enclosures

cc: Danny Crowe, Esq., via e-mail transmittal