

**RECEIVED**

**Jan 10 2025**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

The Honorable J. MARK HAYES, II Circuit Court Judge

Spartanburg County and Cole Alverson in his Official Capacity as County Administrator  
..... Respondents,

v.

The Spartanburg County Board of Zoning Appeals, and Adam Washington Ballenger  
Camp #68, Sons of Confederate Veterans, Inc.,

of which The Spartanburg County Board of Zoning Appeals is a

..... Respondents,

And Adam Washington Ballenger Camp #68, Sons of Confederate Veterans, Inc., is the  
..... Appellant.

Appellate Case No.: 2024-000735

**APPELLANT’S MOTION FOR AN EXTENSION OF TIME TO FILE INITIAL  
REPLY BRIEF**

COME NOW THE Adam Washington Ballenger Camp #68, Sons of Confederate  
Veterans, Inc. who respectfully requests that this Court grant an extension of time to file  
its Initial Reply Brief. The Appellant received Respondents Spartanburg County and Cole  
Alverson in his Official Capacity as County Administrator initial Brief on January 6<sup>th</sup>,  
2025. No brief has been received from Respondent The Spartanburg County Board of

Zoning Appeals. No provision has been made to calculate a new deadline for filing the Initial Reply Brief.

Appellant counsel has discussed this matter with opposing counsel, and opposing counsel does consent to this extension.

Counsel for Appellant is out of the Country and will not return until late January. He also has several pending appeals with upcoming deadlines and a Motion to Lift Stay in this very case. Co-counsel similarly has upcoming deadlines including matters in this very case. Counsel has waited patiently for a brief from the absent Respondent. While the undersigned are working diligently to prepare the Appellant's Initial Reply Brief, additional time would allow counsel to better represent the Appellants and thoroughly respond to Respondents' Brief.

For the foregoing reasons, the Appellant respectfully requests a 30-day extension to complete and file his Initial Reply Brief. This extension would set the deadline no sooner than February 15, 2024.

Respectfully submitted,

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Attorneys for the Appellant

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..... Appellant.

\_\_\_\_\_  
Appellate Case No.: 2024-000735  
\_\_\_\_\_

**PROOF OF SERVICE**

I certify that I have served a copy of the Motion for an Extension of Time to File Appellant’s Initial Reply Brief, electronically to the Court of Appeals, and to the following attorneys of record for the Respondents to the following electronic addresses, on this date January 9, 2025.

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Respectfully submitted,

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Columbia, SC  
January 10, 2025

CC:  
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