

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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OCT 31 2013

**S.C. Supreme Court**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

John Hamilton Smith, Special Referee

Case No.: 2010-CP-40-8943R  
Appellate Case No. 2013-001067

Columbia Venture, LLC,.....Appellant,

v.

Richland County,.....Respondent.

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**APPELLANT’S MOTION TO EXCEED PAGE LIMITATIONS AND FOR  
EXTENSION OF TIME TO FILE INITIAL REPLY BRIEF**

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Appellant, Columbia Venture, LLC, hereby moves pursuant to Rule 240, SCACR to exceed the page limitations in Rule 208(b)(5), SCACR for its Initial Reply Brief as well as for an extension of time in which to file its Initial Reply Brief in this appeal.


This Court has granted Appellant’s Motion to Exceed Page Limitations for its Initial Brief as well as Respondent’s Motion to Exceed Page Limitations for its Initial Brief, allowing briefs of up to 115 and 125 pages, respectively. Both Appellant and Respondent consented to the other party’s Motion. Respondent’s Initial Brief raises numerous complex factual and legal issues, including issues not addressed in Appellant’s Initial Brief. Therefore, Appellant respectfully requests that this Court permit Appellant to file an Initial Reply Brief not to exceed 55 pages.

Respondent's Initial Brief was served on October 28, 2013. Pursuant to Rule 208(a)(3), Appellant's Initial Reply Brief is currently due on November 7, 2013. Appellant respectfully moves to extend the deadline to file its Initial Reply Brief to 45 days after service of Respondent's Initial Brief, which would make the Appellant's Initial Reply Brief due no later than December 12, 2013. Appellant further asks that all deadlines be stayed pending a ruling on this motion.

Counsel for Respondent Richland County has consented to both of Appellant's above-described extension requests, as evidenced by the attached email correspondence.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

By: 

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October 31, 2013

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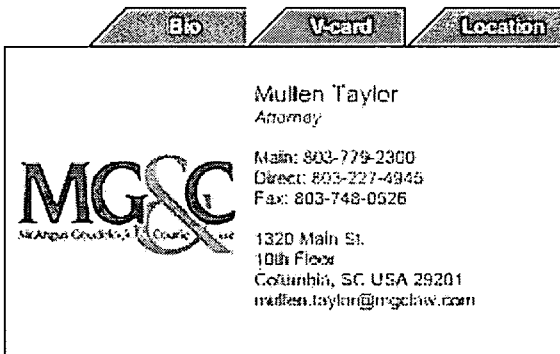
Attorneys for Respondent Richland County

## Black, Elizabeth

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**From:** Mullen Taylor <Mullen.Taylor@mgclaw.com>  
**Sent:** Thursday, October 31, 2013 12:01 PM  
**To:** Black, Elizabeth  
**Subject:** RE: Columbia Venture v. Richland County; extensions

Elizabeth, the County consents to the page and time extensions you describe below.



Please consider the environment  
before printing this email.

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**From:** Black, Elizabeth [<mailto:eblack@hsblawfirm.com>]  
**Sent:** Thursday, October 31, 2013 11:58 AM  
**To:** Mullen Taylor  
**Subject:** Columbia Venture v. Richland County; extensions

Mullen,

Thank you for your time this morning discussing this case. Please confirm the County's consent to Columbia Venture's planned request to the Supreme Court for a reply brief page extension to 55 pages and a deadline extension of up to 45 days from the date of service of the County's initial brief. We have calculated 45 days from October 28, 2013, to be December 12, 2013.

Thank you,  
Elizabeth

**Haynsworth  
Sinkler Boyd, P.A.**

ATTORNEYS AND COUNSELORS AT LAW

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John Hamilton Smith, Special Referee

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Case No. 2010-CP-40-8943R  
Appellate Case No. 2013-001067

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Richland County,

Respondent,

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Columbia Venture, LLC,

Appellant.

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**CERTIFICATE OF SERVICE**

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This is to certify that I caused a copy of the foregoing Appellant's Motion to Exceed Page Limitations and for Extension of Time to File Initial Reply Brief to be served on the following individuals in the manner expressed below and addressed as follows:

**Via Hand-Delivery & Email:**

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October 31, 2013

  
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Brenda Black

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