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**Via Electronic Filing**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: First Request for Extension  
*Bailem et al. v. County of Charleston et al.*  
Appellate Case No. 2025-001719

Dear Madam Clerk:

We have been engaged by the Respondent Town of Mount Pleasant in the above-referenced appeal and have today filed our notice of appearance. Through this letter, we respectfully request that the Court extend the Respondents' deadline to file their initial briefs and designations of matter by 35 days in order to get this deadline beyond the holiday season. This is the first such requested extension. If granted, the Respondents' new deadline would be Wednesday, January 7, 2026.

We will submit the filing fee associated with this request within five days of this correspondence. We appreciate the Court's consideration of this request.

Best regards,

/s/ M. Todd Carroll

cc: All Counsel of Record