

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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FEB 28 2014

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.

**APPELLANT'S MOTION FOR EXTENSION OF TIME TO SERVE
AMENDED RECORD ON APPEAL**

Appellant, Columbia Venture, LLC, hereby moves pursuant to Rule 240, SCACR, for an extension of time in which to serve a copy of an Amended Record on Appeal on Respondent Richland County under Rule 210(a), SCACR, in this appeal, and for a stay of the current deadline for the parties to file and serve Final Briefs pursuant to Rule 211(a), SCACR.

On February 20, 2014, this Court issued an Order denying Appellant's proposal to submit some or all of the copies of the Record on Appeal electronically. In the February 20, 2014 Order, the Court further directed the parties to scour the current version of the Record and, if possible, further cull the proposed Record on Appeal in cooperation with one another. Counsel for Appellant and Respondent have communicated regarding the


Court's February 20, 2014 Order and believe that further cooperative culling of the Record is appropriate and achievable.

Pursuant to this Court's Order of January 15, 2014, on February 19, 2014, Appellant served a copy of the originally prepared Record on Appeal on counsel for Respondent. By operation of Rule 211(a), SCACR, the parties are currently due to file and serve their Final Briefs on March 11, 2014. In order to comply with the Court's February 20, 2014 Order, Appellant respectfully moves to postpone the deadline for filing and serving Final Briefs until after the parties reevaluate the Record on Appeal. Appellant respectfully moves the Court for a deadline of filing an Amended Record on Appeal on counsel for Respondent on or before 60 days from the date the Court enters the order requested in this Motion. All remaining deadlines would be as stated in the South Carolina Rules of Appellate Procedure.

Counsel for Respondent Richland County has graciously consented to Appellant's extension request, as evidenced by the attached email correspondence.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, PA.

By: 

Manton M. Grier, Bar No. 2265
James Y. Becker, Bar No. 64661
Elizabeth H. Black, Bar No. 76067
Haynsworth Sinkler Boyd, P.A.
Post Office Box 11889
Columbia, SC 29211-1889
803-779-3080
803-765-1243 (fax)

Attorneys for Appellant Columbia Venture,
LLC

February 28, 2014

Other counsel of record:

M. McMullen Taylor, Esq.
Thomas E. Lydon, Esq.
Weston Adams, III, Esq.
McAngus Goudelock & Courie, LLC
Post Office Box 12519
Columbia, SC 29211
803-779-2300
803-748-0526 (fax)

Pope D. Johnson, III, Esq.
Attorney at Law
1230 Richland Street
Columbia, SC 29201
803-779-9791
803-253-6084 (fax)

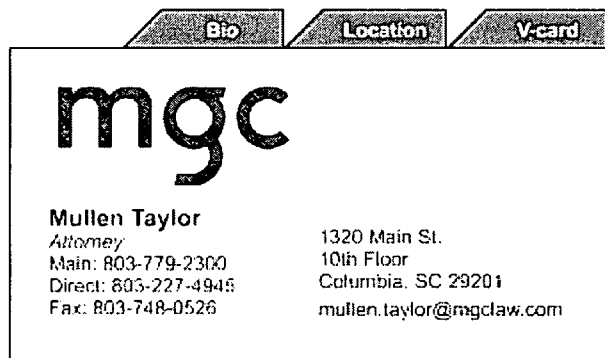
John D. Echeverria, Esq.
Vermont School of Law
164 Chelsea Street
Post Office Box 96
South Royalton, Vermont 05068
802-831-1386

Attorneys for Respondent Richland County

Black, Elizabeth

From: Mullen Taylor <Mullen.Taylor@mgclaw.com>
Sent: Friday, February 28, 2014 12:12 PM
To: Black, Elizabeth
Subject: RE: Columbia Venture v. Richland County; draft motion attached

The County consents to the 60-day extension requested in Columbia Venture's motion.



Please consider the environment before printing this email.

From: Black, Elizabeth [<mailto:eblack@hsblawfirm.com>]
Sent: Friday, February 28, 2014 12:04 PM
To: Mullen Taylor
Cc: Grier, Manton; Becker, James; Tommy Lydon; pope@popejohnsonlaw.com; John Echeverria (JECHEVERRIA@vermontlaw.edu)
Subject: Columbia Venture v. Richland County; draft motion attached

Mullen,

I hope you're doing well. I've attached a motion that we would like to submit to the Supreme Court (today if possible) asking for a 60 day extension for CV to serve an amended Record on Appeal on the County. Would you please let me know if the County will consent to this filing?

Thanks,
Elizabeth

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

ATTORNEYS AND COUNSELORS AT LAW

Elizabeth H. Black | Attorney | Haynsworth Sinkler Boyd, P.A.

1201 Main Street, 22nd Floor (29201) | Post Office Box 11889 (29211) | Columbia, South Carolina
Phone: 803.779.3080 | Fax: 803.765.1243 | Direct: 803.540.7753

[website](#) | [bio](#) | [vCard](#) | [map](#) | [email](#)

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Richland County, Respondent,

v.

Columbia Venture, LLC, Appellant.

CERTIFICATE OF SERVICE

This is to certify that I caused a copy of the foregoing Appellant's Motion for Extension of Time to Serve Amended Record on Appeal to be served on the following individuals in the manner expressed below and addressed as follows:

Via U.S. Mail & Email:

M. McMullen Taylor
Thomas E. Lydon
Weston Adams, III
McAngus, Goudelock & Courie, LLC
1320 Main Street, 10th Floor
Columbia, South Carolina 29201
Mullen.taylor@mgclaw.com
tlydon@mgclaw.com

Via U.S. Mail & Email:

John D. Echeverria
Vermont School of Law
164 Chelsea Street
P.O. Box 96
South Royalton, VT 05068
jecheverria@vermontlaw.edu

Via U.S. Mail and Email:

Pope D. Johnson, III
Attorney at Law
1230 Richland Street
Columbia, South Carolina 29201
pope@popejohnsonlaw.com

February 28, 2014