

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2012-CP-10-6922

RECEIVED

OCT 14 2014

SC Court of Appeals

13838

Tipperary Sales d/b/a La-Z-Boy Furniture Gallery Appellant,

v.

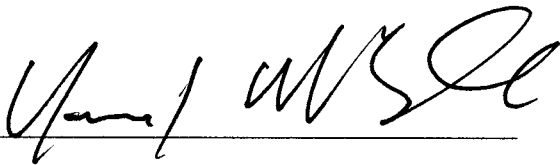
South Carolina Department of Transportation, South Carolina Department of Health and
Environmental Control, City of North Charleston, Charleston Water System, and Associated
Developers, Inc..... Defendants,

of which South Carolina Department of Transportation, South Carolina Department of Health
and Environmental Control, City of North Charleston, and Charleston Water System are
..... Respondents.

APPELLANT'S MOTION FOR EXTENSION OF TIME

Appellant hereby moves for an extension of time in which to file their Initial Brief of Appellant. The Appellants respectfully request a thirty (30) day extension from the transcript receipt date, therefore making the Initial Brief of Appellant due November 16, 2014. This Motion is based on the anticipated need for additional time to prepare the Initial Brief of Appellant. Appellant has conferred with all counsel of record and there are no objections to an extension being granted.

October 9, 2014



Michael S. Seekings, Esq.
Yancey A. McLeod III, Esq. (Bar No.: 80911)
Leath Bouch & Seekings, LLP
92 Broad Street
Post Office Box 59 (29402)
Charleston, S.C. 29401
(843) 937-8811
mseekings@leathbouchlaw.com
ymcleod@leathbouchlaw.com
Attorneys for Appellant

OTHER COUNSEL OF RECORD:

Roy Maybank, Esq.
Jason Daigle, Esq.
Maybank Law Firm, LLC
531 Savannah Highway
P.O. Box 12579 (29422)
Charleston; SC 29407
Attorneys for Respondent SCDOT

G. Wade Cooper, Esq.
Buyck & Sanders Law Firm, LLC
757 Johnnie Dodds Blvd., Suite 100
P.O. Box 2424
Mt. Pleasant, SC 29465-2424
*Attorney for Respondent Charleston
Water System*

Andrew S. Halio, Esq.
Halio & Halio
13 N. Adgers Wharf
P.O. Box 747
Charleston, SC 29402-0747
Attorney for Respondent SCDHEC

Phillip S. Ferderigos
Barnwell Whaley Patterson &
Helms, LLC
288 Meeting St, Suite 200
P.O. Drawer H
Charleston, SC 29402-0197
*Attorney for Respondent City of
North Charleston*

Jeff Wiseman, Esq.
Young Clement Rivers, LLP
25 Calhoun St., Suite 400
P.O. Box 993
Charleston, SC 29402
*Attorney for Defendant Associated
Developers, Inc.*

Andrew S. Halio, Esq.
Halio & Halio
13 N. Adgers Wharf
P.O. Box 747
Charleston, SC 29402-0747
*Attorney for Respondent
SCDHEC*

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2012-CP-10-6922

RECEIVED
OCT 14 2014
SC Court of Appeals

Tipperary Sales d/b/a La-Z-Boy Furniture Gallery Appellant,

v.

South Carolina Department of Transportation, South Carolina Department of Health and
Environmental Control, City of North Charleston, Charleston Water System, and Associated
Developers, Inc..... Defendants,

of which South Carolina Department of Transportation, South Carolina Department of Health
and Environmental Control, City of North Charleston, and Charleston Water System are
.....Respondents.

PROOF OF SERVICE

I certify that I served the Appellants' Motion for Extension of Time on October 10,
2014, by depositing a copy of it in the United States Mail, postage prepaid, addressed as
follows::

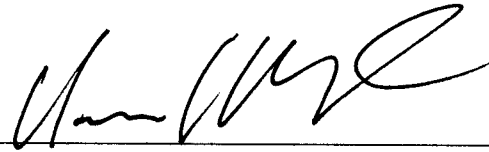
Roy Maybank, Esq.
Jason Daigle, Esq.
Maybank Law Firm, LLC
531 Savannah Highway
P.O. Box 12579 (29422)
Charleston; SC 29407
Attorneys for Respondent SCDOT

G. Wade Cooper, Esq.
Buyck & Sanders Law Firm, LLC
757 Johnnie Dodds Blvd., Suite 100
P.O. Box 2424
Mt. Pleasant, SC 29465-2424
*Attorney for Respondent Charleston
Water System*

Phillip S. Ferderigos
Barnwell Whaley Patterson &
Helms, LLC
288 Meeting St, Suite 200
P.O. Drawer H
Charleston, SC 29402-0197
*Attorney for Respondent City
of North Charleston*

Jeff Wiseman, Esq.
Young Clement Rivers, LLP
25 Calhoun St., Suite 400
P.O. Box 993
Charleston, SC 29402
*Attorney for Defendant
Associated Developers, Inc.*

October 9, 2014



Michael S. Seekings, Esq.
Yancey A. McLeod III, Esq. (Bar No.: 80911)
Leath Bouch & Seekings, LLP
92 Broad Street
Post Office Box 59 (29402)
Charleston, S.C. 29401
(843) 937-8811
mseekings@leathbouchlaw.com
ymcleod@leathbouchlaw.com
Attorneys for Appellant



DAVID RAMSAY HOUSE
c. 1740

LEATH, BOUCH & SEEKINGS, LLP

COMMERCIAL LITIGATION • CONSTRUCTION • ENVIRONMENTAL

October 9, 2014

RECEIVED

OCT 14 2014

SC Court of Appeals

VIA US MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

Re: Tipperary Sales d/b/a La-Z-Boy Furniture Gallery v. South Carolina Department
of Transportation, et al.
Case No.: 2012-CP-10-6922
Appellate Case No.: 2014-000582

Dear Ms. Kitchings:

Enclosed please find the Appellants' Motion for Extension of Time in the above-referenced appeal. By copy of this letter, I am forwarding a copy of this filing to all counsel of record. Please do not hesitate to contact me with questions or concerns.

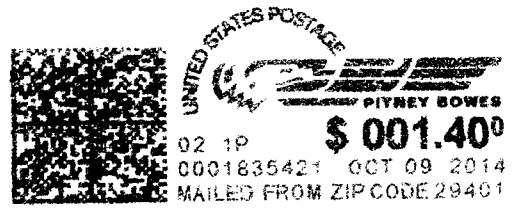
Thank you and with best regards, I am

Very truly yours,

LEATH, BOUCH & SEEKINGS, LLP

Yancey A. McLeod, III, Esq.

cc: All Counsel of Record (via email)



First Class Mail



LEATH, BOUCH & SEEKINGS, LLP

P.O. BOX 59 • CHARLESTON, SC 29402
92 BROAD STREET
CHARLESTON, SC 29401

**The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201**

RECEIVED

OCT 14 2014

SC Court of Appeals

