

Greene, Diane

From: Kitchings, Jenny
Sent: Tuesday, November 18, 2014 4:20 PM
To: Greene, Diane
Cc: Amick - Cassidy, Monica
Subject: FW: Arkay, LLC, et. al. vs. City of Charleston; Case No: 2014-001466
Attachments: L_T CLRK Re_ consent of counsel for extension.ss.pdf

For file.

-----Original Message-----

From: Megan Gardner [mailto:mgardner@barrungermcintosh.com]
Sent: Tuesday, November 18, 2014 4:03 PM
To: Kitchings, Jenny
Cc: cantwellf@charleston-sc.gov; Capers Barr; wjohnson@yclaw.com; tst@hellmanyates.com
Subject: RE: Arkay, LLC, et. al. vs. City of Charleston; Case No: 2014-001466

Dear Ms. Kitchings:

Attached please find additional correspondence in the above referenced matter. Please let me know if you are unable to open the attachment.

Thank you,

Megan Gardner
Paralegal to Capers G. Barr, III
Barr, Unger & McIntosh, L. L. C
11 Broad Street
Charleston, South Carolina 29402-1037
(843) 577-5083
(843) 723-9039 (fax)
mgardner@barrungermcintosh.com

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NOV 18 2014
SC Court of Appeals

**BARR, UNGER
& MCINTOSH**
ATTORNEYS AT LAW

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NOV 18 2014

SC Court of Appeals

November 18, 2014

(By E-Mail)

Capers G. Barr, III
Direct Dial: 843-377-1227

Email: cgb@barrungermcintosh.com

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NOV 18 2014
SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

RE: Arkay, LLC and Robert R. Knoth, its member v. City of Charleston, City of Charleston Board of Zoning Appeals, Andrew Pinckney Inn and Robert A. Molony
Appeal Case No: 2014-001466
Case No: 2013-CP-10-3864

Dear Ms. Kitchings:

I represent the Respondents Arkay, LLC and Robert R. Knoth in the above appeal.

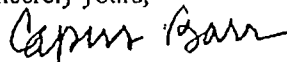
This letter is to respectfully request a thirty (30) day extension of time within which to file Respondents' Initial Brief in the case.

Appellant's Initial Brief was received by me on October 23, 2014. By my calculation, the ordinary time for filing the Respondents' Brief would be November 24th, 2014, so that if this extension is granted, our Respondents' Brief would be due December 29th, 2014. I have conferred with opposing counsel, who does not oppose this request.

Our check in the sum of \$25.00 as filing fee is enclosed. Please advise if you require anything further.

Thank you for your consideration and with kind regards.

Sincerely yours,



Capers G. Barr, III

Enclosures (as stated).

CGBIII/meg

cc: Robert R. Knoth (by e-mail)
Richard Knoth (by e-mail)
Frances I. Cantwell, Esq. (by e-mail)

Reply to Charleston Office:
11 Broad Street P.O. Box 1037 Charleston, SC 29402
Telephone 843-577-5083 Fax 843-723-9039

Edisto Office
006 Oyster Park Edisto Island, SC 29438
Telephone 843-869-2389 Fax 843-869-0110

**BARR, UNGER
& MCINTOSH ^{PC}**
ATTORNEYS AT LAW

Capers G. Barr, III
Direct Dial: 843-377-1227
Email: cgb@barrungermcintosh.com

November 18, 2014

(By E-Mail and First Class Mail)

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NOV 18 2014

SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

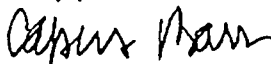
*RE: Arkay, LLC and Robert R. Knoth, its member v. City of Charleston, City of
Charleston Board of Zoning Appeals, Andrew Pinckney Imm and Robert A.
Molony
Appeal Case No: 2014-001466
Case No: 2013-CP-10-3864*

Dear Ms. Kitchings:

In my earlier letter sent to you requesting an extension of time to file Respondent's Brief, a copy of which is enclosed, I neglected to inform you that I have also consulted with other opposing counsel, Thomas S. Tisdale, Jr., Esq. and Wilbur E. Johnson, Esq., both of whom also consent and are copied with this.

Thank you again for your consideration.

Sincerely yours,



Capers G. Barr, III

Enclosures (as stated).

CGBIII/meg

cc: Robert R. Knoth (by e-mail; w/enclosure)
Richard Knoth (by e-mail; w/enclosure)
Frances I. Cantwell, Esq. (by e-mail, w/enclosure)
Thomas S. Tisdale Jr., Esq. (by e-mail; w/enclosure)
Wilbur E. Johnson, Esq. (by e-mail; w/enclosure)