

STATE OF SOUTH CAROLINA
In the Court of Appeals

74201

APPEAL FROM Horry COUNTY
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

Court of Appeals Case No.: 2013-002793

K N S Foundation, LLC d/b/a Elite Appellant

v.

City of Myrtle Beach Respondent

APPELLANT'S
MOTION FOR EXTENSION OF TIME TO FILE
FINAL REPLY BRIEF

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SC Court of Appeals

Counsel for the Appellant hereby respectfully moves this Court, pursuant to Rule 240(a), SCACR, for a ten (10) day extension of time to file the Appellant's Final Reply Brief.

As a result of Appellant's counsel's work calendar, Appellant respectfully contends that good cause exists for an extension of time to file their Final Reply Brief.

Wherefore, Appellant contends that this appeal and the interest of justice will be served by granting Appellant an extension of time, Appellant therefore respectfully prays the Court for an order granting an extension of ten (10) days to file its Final Reply Brief.

Accordingly, Appellant requests the Court to enter an Order enlarging the time up to and including November 27, 2014 to submit its Final Reply Brief.

Respectfully submitted,



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November 17, 2014

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge
Trial Court Case No.: 2013-CP-26-04103

Appellate Case No. 2013-002793

K N S Foundation, LLC d/b/a Elite Appellant

v.

City of Myrtle Beach Respondent

PROOF OF SERVICE

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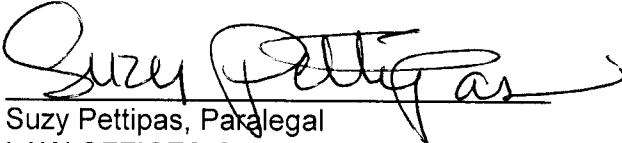
SC Court of Appeals

I certify that I have served a copy of the Appellant's Motion for Extension of Time to file its FINAL REPLY BRIEF by depositing a copy of it in the U.S. Mail on November 17, 2014, addressed to the attorneys of record:

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Battle & Vaught, PA
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November 17, 2014

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November 17, 2014

Honorable Jenny Abbott Kitchings
Clerk of the Court
South Carolina Court of Appeals
Post Office Box 116929
Columbia, South Carolina 29211

Re: *KNS Foundation v Mary McDowell*
Appellate Case No. 2013-002793

Dear Ms. Kitchings:

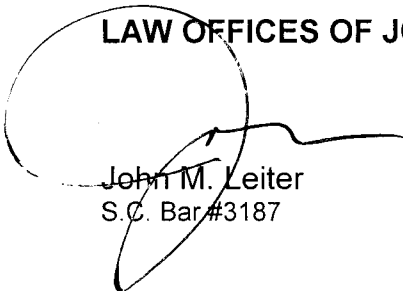
The Appellant's Final Brief and Final Reply Brief in the above-referenced case are due to be filed and served on November 17, 2014. We have no changes to the Final Brief that was previously filed. However, at this time I would like to request a ten-day extension of time to file and serve the Appellant's Final Reply Brief, to November 27, 2014.

To cover the cost of filing this request, I am enclosing my firm's check in the amount of \$25.00.

Should you have any questions regarding this matter, feel free to contact me.

Sincerely yours,

LAW OFFICES OF JOHN M. LEITER, PA


John M. Leiter
S.C. Bar #3187

JML/smp
encl.

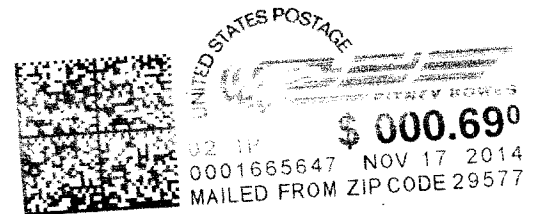
cc: Michael Warner Battle, Esq.
Howell V. Bellamy, III, Esq.
Thomas Eugene Eilenburg, Esq.
Armand G. Derfner, Esq.

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SC Court of Appeals

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SC Court of Appeals

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