

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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DEC 04 2014

APPEAL FROM RICHLAND COUNTY

SC Court of Appeals

Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

MH 368

C/A No. 2013-CP-40-4051

Case No. 2014-001824

Andreas Ganotakis d/b/a Seven Days Food Mart, LLC Appellant,

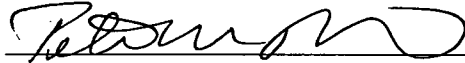
v.

City of Columbia Board of Zoning Appeals..... Respondent.

MOTION FOR EXTENSION OF TIME

In connection with the above-referenced appeal, Respondent files this Motion for Extension of Time. Respondent requests an extension of thirty (30) days for the deadline to file the Initial Brief of the Respondent. The requested extension, if granted, would make Respondent's Initial Brief due on January 9, 2015. This Motion is not being made for purposes of delay. This is the first extension request in this matter. Good cause exists for this Motion because of other work deadlines and duties and because of other outside obligations. Counsel for Respondent has attempted to confer with counsel for Appellant but has been unable to get a response from opposing counsel.

RILEY POPE & LANEY, LLC



Peter M. Balthazor, SC Bar No. 68244

2838 Devine Street

Post Office Box 11412 (29211)

Columbia, South Carolina 29205

(803) 799-9993

Attorney for Respondent

December 3, 2014

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

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Case No. 2014-001824

Andreas Ganotakis d/b/a Seven Days Food Mart, LLC Appellant,

v.

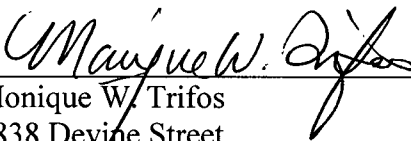
City of Columbia Board of Zoning Appeals..... Respondent.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time and this proof of service by depositing a copy of the same in the United States Mail, postage prepaid, on December 3, 2014 at the address below:

Dietrich Andre' Lake, Esquire
1034 Briargate Circle, Suite 201
Columbia, SC 29210-6539

RILEY POPE & LANEY, LLC



Monique W. Trifos
2838 Devine Street
Post Office Box 11412 (29211)
Columbia, South Carolina 29205
(803) 799-9993
Attorney for Respondent

December 4, 2014

RILEY POPE & LANEY, LLC
ATTORNEYS AND COUNSELORS AT LAW

2838 DEVINE STREET
POST OFFICE BOX 11412 (29211)
COLUMBIA, SOUTH CAROLINA 29205

TELEPHONE
(803) 799-9993

FACSIMILE
(803) 239-1414

December 3, 2014

HAND DELIVERED

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

Re: Andreas Ganotakis d/b/a Seven Days Food Mart, LLC v. City of Columbia Board
of Zoning Appeals
Case No.: 2013-CP-40-04051
Court of Appeals Reference No. 2014-001824

Dear Ms. Kitchings:

The Initial Brief of Respondent in the above referenced matter is due to be served and filed by December 10, 2014. By this letter and the enclosed Motion, I respectfully request an extension of thirty (30) days. This is the first extension request for the initial brief, and it is not intended for the purpose of delay. Also enclosed is our \$25.00 check for the motion filing fee.

I appreciate your consideration of this request and ask that you hold the filing time in abeyance during the time in which this request is pending. Please call me if you have any questions concerning this correspondence or any other matter.

Sincerely,



Peter M. Balthazor

PMB/mwt

Enclosures

cc: Dietrich A. Lake, Esquire (w/enclosure)

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