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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas
The Honorable Kristi L. Harrington, Circuit Court Judge

RECEIVED

Lower Court Case No. 2014-CP-08-1840
Appellate Case No. 2015-000713

JUL 27 2015
SC Court of Appeals

BP Amoco Chemical CompanyPlaintiff/Appellant,

v.

City of Charleston; Tract 7, LLC; Cainho Land & Timber, LLC; and Southern Timber, LLC.....Defendants,

Of whom Cainho Land & Timber, LLC and Southern Timber, LLC are
.....Respondents.

**RESPONDENTS CAINHOY LAND & TIMBER, LLC AND
SOUTHERN TIMBER, LLC'S
MOTION FOR EXTENSION OF TIME**


Pursuant to South Carolina Appellate Court Rule 263(b), Respondents Cainho Land & Timber, LLC and Southern Timber, LLC, move for an extension of thirty (30) days from the existing deadline to file their Initial Brief and Designation of Matter in the above captioned matter. Respondents' Initial Brief is now due on or before August 12, 2015. Respondents request an extension of thirty (30) days to file their Initial Brief and Designation of Matter on the grounds that Respondents' counsel has several

commitments that require out of town travel and has long standing family travel plans that were scheduled prior to the current deadline of August 12, 2015.

Respondents' Initial Brief and Designation of Matter will be due on or before September 11, 2015, if the extension is granted. Respondents' counsel has conferred with counsel for Appellant regarding this motion, and counsel for Appellant consents to the thirty (30) day extension.

For the reasons set forth herein, Respondents request a thirty (30) day extension to serve and file their Initial Brief and Designation of Matter.

BARNWELL WHALEY PATTERSON & HELMS, LLC

BY: 
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*Attorneys for the Defendants Tract 7, LLC;
Cainhoy Land & Timber, LLC; and
Southern Timber, LLC*

Charleston, South Carolina
July 22, 2015

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BP Amoco Chemical CompanyPlaintiff/Appellant,

v.

City of Charleston; Tract 7, LLC; Cainhoy Land & Timber, LLC; and Southern Timber, LLC.....Defendants,

Of whom Cainhoy Land & Timber, LLC and Southern Timber, LLC are
.....Respondents.

PROOF OF SERVICE

This is to certify that I, Danyelle L. Young, have this day served counsel for the Plaintiff/Appellant in the foregoing matter with a copy of the foregoing **Respondents Cainhoy Land & Timber, LLC and Southern Timber, LLC's Motion for Extension of Time** by depositing same in the United States Mail with adequate postage affixed thereon to ensure delivery, addressed as follows:


Douglas M. Muller, Esquire
E. Brandon Gaskins, Esquire
Moore & Van Allen, PLLC
78 Wentworth Street (29401)
P.O. Box 22828
Charleston, SC 29413-2828

Attorneys for Appellant BP Amoco Chemical Company

Frances I. Cantwell
Assistant Corporation Counsel
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50 Broad Street
Charleston, S.C. 29401

Attorneys for the City of Charleston

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***On Behalf of the Defendants Tract 7, LLC;
Cainhoy Land & Timber, LLC; and
Southern Timber, LLC***

Charleston, South Carolina
July 22, 2015



Danyelle L. Young, Legal Assistant
dyoung@barnwell-whaley.com

July 22, 2015

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JUL 27 2015

SC Court of Appeals

4008.001
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1205 Pendleton Street
Post Office Box 11629 (29211)
Columbia, South Carolina 29201

**Re: Tract 7, LLC v. South Carolina Department of Health and Environmental Control
and BP Amoco Chemical Company
Appellate Case No.: 2015-000713**

Dear Madame Clerk:

Please find enclosed the original and eight (8) copies of Respondents Cainhoy Land & Timber, LLC and Southern Timber, LLC's Motion for Extension of Time in the above-referenced matter. Please file the same and return two (2) stamped "filed" copies to our office in the envelope provided.

By copy of this letter and enclosure to opposing counsel, we are informing them of this communication with the Court. Thank you for your assistance in this matter.

Very truly yours,

Danyelle L. Young, Legal Assistant to
D. Summers Clarke, II, Esquire

/dly
Enclosures

cc: Douglas M. Muller, Esquire
E. Brandon Gaskins, Esquire
Frances I. Cantwell, Esquire

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**BARNWELL
WHALEY**

PATTERSON & HELMS LLC

75
1938-2013
YEARS ■

P.O. Drawer H, Charleston, SC 29402-0197

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The Honorable Jenny Abbott Kitchings

JUL 27 2015

South Carolina Court of Appeals

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