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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

RECEIVED

Hon. Kristi Lea Harrington, Circuit Court Judge

JUL 29 2015

SC Court of Appeals

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

BP Amoco Chemical Company,

Plaintiff/Appellant,

v.

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

Defendants,

Of whom Cainhoy Land and Timber , LLC
And Southern Timber, LLC are

Respondents.

MOTION FOR EXTENSION
TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER FOR
THE RECORD ON APPEAL

City of Charleston hereby moves for an extension of time, until September 11, 2015, in which to file its Initial Brief and Designation of Matter for the Record on Appeal. This request is necessitated due to counsel's current workload and schedule. The extension is for a period of thirty days from the date the Initial Brief and Designation of Matter are due.

Counsel has consulted with counsel of record regarding this motion, all of whom have indicated consent.

July 27, 2015

Frances I. Cantwell

Charlton de Saussure, Jr.
Corporation Counsel
Frances I. Cantwell
Assistant Corporation Counsel
50 Broad Street
Charleston, South Carolina 29401
Tel. (843) 724-3730
Attorney for City of Charleston

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CERTIFICATE OF SERVICE

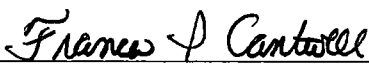
The undersigned certifies that on the 27th day of July, 2015, a true and correct copy of the City of Charleston's Motion for an Extension of Time to File Initial Brief and Designation of Matter for Inclusion in the Record on Appeal was deposited in the United States mail, first-class prepaid postage affixed, and addressed to:

Douglas M. Muller, Esq.
E. Brandon Gaskins, Esq.
Moore & Van Allen, PLLC
P.O. Box 22828
Charleston, South Carolina 29413-2828

And

M. Dawes Cooke, Jr., Esq.
D. Summers Clarke, II, Esq.
Barnwell, Whaley, Patterson & Helms, LLC
P. O. Drawer H
Charleston, South Carolina 29402

July 27, 2015



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Attorney for City of Charleston



City of Charleston

WILLIAM B. REGAN LEGAL CENTER

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July 27, 2015

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JUL 29 2015

Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

SC Court of Appeals

RE: BP Amoco Chemical Company v. City of Charleston,
Tract 7, LLC, Cainhoy Land and Timber, LLC and
Southern Timber, LLC
Appellate Case No. 2015-000713

Dear Ms. Kitchings:

In regard to the above, enclosed for filing is an original and seven copies of a Motion for an Extension of Time to File the Initial Brief and Designation of Matter to be Included in the Record on Appeal, submitted on behalf of the City of Charleston. Also enclosed is a Certificate of Service on Counsel and the filing fee of \$25.00.

Please return a clocked copy of the Motion to me in the self-addressed stamped envelope provided.

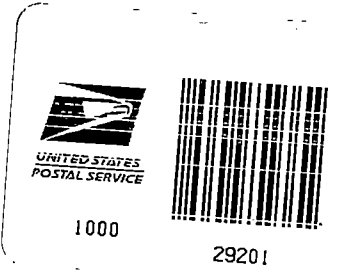
With kind regards, I am

Yours truly,

Frances I. Cantwell

Frances I. Cantwell
Encls.

cc: M Dawes Cooke, Jr., Esq.
D. Summers Clarke, II, Esq.
E. Brandon Gaskins, Esq.
Douglas M. Muller, Esq.
Charlton de Saussure, Jr. Esq.



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City of Charleston
Legal Department
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