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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Mikell R. Scarborough, Master in Equity

Appellate Case No. 2015-000034

RECEIVED

AUG 05 2015

SC Court of Appeals

THE WASHINGTON LIGHT INFANTRY OF
CHARLESTON SOUTH CAROLINA, INC., Respondent,

v.

THE SEA GRANT CONSORTIUM, an Agency
and Political Subdivision of the State of South Carolina.....Appellant.

MOTION FOR EXTENSION OF TIME TO FILE AND SERVE RECORD ON APPEAL

Appellant, The Sea Grant Consortium, an Agency and Political Subdivision of the State of South Carolina ("Sea Grant"), by and through its undersigned counsel, respectfully requests an extension of thirty (30) days from August 11, 2015, in which to serve the Record on Appeal and file proof of service with this Court and would show unto this Court as follows:

I.

The Record on Appeal is due to be served and filed on August 11, 2015. Appellant has recently retained the undersigned as new counsel to represent Sea Grant in this matter. Consequently, on August 3, 2015, Appellant filed and served a Motion for Substitution of Counsel.

This extension request is not for purposes of delay but rather to ensure that new counsel can fully research and review this case and properly prepare the Record on Appeal before moving forward in this matter.

Appellant would therefore request a thirty (30) day extension of time within which to serve and file the Record on Appeal and request that the time for filing be held in abeyance pending a ruling on this Motion. Richard Hyman, Esquire, counsel for Respondent in this matter, has graciously consented to Appellant's request and given express permission to the undersigned to signify his consent below.

WHEREFORE, Appellant prays that the Court extend the deadline for the service and filing of the Record on Appeal in this case for thirty (30) days from August 11, 2015, and for such other and further relief as the Court may deem just and proper.

WE SO MOVE:

R. Bruce Wallace by [Signature] of permission

R. Bruce Wallace
Mary D. Shahid
NEXSEN PRUET, LLC
205 King Street, Suite 400 (29401)
P.O. Box 486
Charleston, SC 29402
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MShahid@nexsenpruet.com

Attorneys for Appellant
THE SEA GRANT CONSORTIUM, an Agency and
Political Subdivision of the State of South Carolina

August 5, 2015
Charleston, South Carolina

WE SO CONSENT:

M. Richardson Hyman Jr. by [Signature] of permission

M. Richardson Hyman, Jr.
P.O. Box 127
Charleston, SC 29402
(843) 416-1047
Attorney for Respondent
THE WASHINGTON LIGHT INFANTRY OF
CHARLESTON SOUTH CAROLINA, INC.

August 5, 2015

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R. Bruce Wallace
Member
SC Court of Appeals
Admitted in SC

August 5, 2015

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: The Washington Light Infantry of Charleston South Carolina, Inc. v
The Sea Grant Consortium, an Agency and Political Subivision of the
State of South Carolina
Appellate Case No: 2015-000034

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of a Motion for Extension
of Time to File and Serve Record on Appeal. I also enclose a Proof of Service
indicating service of the Motion above. Finally, I enclose our firms check in the
amount of \$25.00 for same.

I would greatly appreciate you filing the Motion for Extension of Time to File
and Serve Record on Appeal with the Court of Appeals and returning a filed stamped
copy to me via the bearer of this letter.

By copy of this letter, I am serving all counsel of record, via U.S. mail, with a
copy of same.

Very truly yours,

*R. Bruce Wallace by [Signature]
by permission*

R. Bruce Wallace
RBW/rp
Enclosure(s)

cc: James A. Stuckey, Jr., Esquire
Alissa C. Lietzow, Esquire
M. Richardson Hyman, Jr., Esquire

- Charleston
- Charlotte
- Columbia
- Greensboro
- Greenville
- Hilton Head
- Myrtle Beach
- Raleigh