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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III  
Administrative Law Judge

Appellate Case No. 2015-002611

RECEIVED  
JAN 28 2016  
SC Court of Appeals

James F. Early Trust.....Appellant,

v.

Charleston County Assessor .....Respondent\_

APPELLANT'S MOTION TO EXTEND  
TIME TO FILE ITS INITIAL BRIEF AND DESIGNATION OF MATTER

Pursuant to Rule 240 SCACR, the Respondent hereby moves for an Order allowing the Appellant an additional thirty (30) days to file its Initial Brief in this case. This Motion is based upon the fact that the undersigned counsel for the Appellant miscalculated the date for the Initial Brief and Designation of Matters to be included in the Record on Appeal to be filed and thought correspondence from this Court would be forthcoming acknowledging the filing of the Notice of Appeal. Counsel also moves for an order to allow the Initial Brief and Designation of Matters to be included in the Record on Appeal to be filed by February 15, 2015, out of time. This Motion is further based on

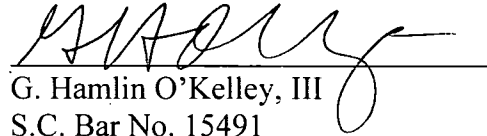
counsel's schedule over the last two weeks that has had him out of town in hearings, trials, and depositions.

Counsel further requests that all timelines and deadlines for submissions be held in abeyance while the Court considers this submission.

Counsel has spoken to opposing counsel for the Appellant who consents to this Motion.

Respectfully submitted

January 27, 2016



G. Hamlin O'Kelley, III  
S.C. Bar No. 15491  
Buist, Byars & Taylor, LLC  
652 Coleman Blvd., Suite 200  
Mt. Pleasant, SC 29464  
(843) 856-4488

*Attorneys for the Appellant James F.  
Early Trust*

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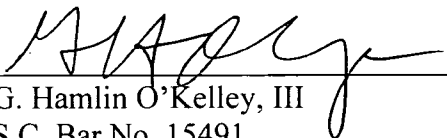
Charleston County Assessor .....Respondent.

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PROOF OF SERVICE

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I hereby certify that I have served the Appellant's Motion to Extend Time to File Its Initial Brief and Designation of Matter in this matter by depositing a copy of same in the U.S. Mail, postage prepaid, on January 27, 2016, addressed to counsel of record as follows: Bernard E. Ferrara, Jr., Esq. and Johanna S. Gardner, Esq., Charleston County Attorney's Office, 4045 Bridge View Drive, North Charleston, SC 29405-7674 as well as upon the Honorable Ralph King Anderson, III, 1205 Pendleton Street, Suite 224, Columbia, SC 29201.



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Mt. Pleasant, South Carolina  
January 27, 2016

*Attorney for the Appellant James F.  
Early Trust*

January 27, 2016

**RECEIVED** G. HAMLIN O'KELLEY, III  
ATTORNEY AT LAW  
Hamlin.okelley@buistbyars.com  
JAN 28 2016  
**SC Court of Appeals**

**VIA OVERNIGHT DELIVERY**

The Honorable Jenny Abbott Kitchings  
1220 Senate Street  
P.O. Box 11629  
Columbia, SC 29211

*Re: James F. Early Trust v. Charleston County Assessor  
Appellant Case No. 2015-002611  
File No.: 1082.0001*

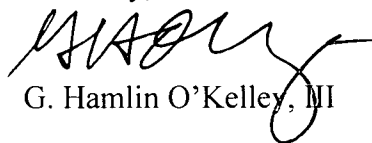
Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of the Appellant's Motion to Extend Time to File its Initial Brief and Designation of Matter and Proof of Service in the above-referenced matter along with the filing fee in the amount of \$25.00.

Please file the original and return the filed-stamped copies to me in the enclosed envelope. By copy of this letter, I am serving same upon the Honorable Ralph King Anderson, III, presiding Administrative Law Judge, Bernard E. Ferrara, Jr., Esq., and Johanna S. Gardner, Esq., attorneys for the Respondent Charleston County Assessor.

Should you have any questions, please feel free to contact me. With kindest regards, I remain

Sincerely,

  
G. Hamlin O'Kelley, III

Enclosure

cc. (w/enc.): The Hon. Ralph King Anderson, III  
Bernard E. Ferrara, Jr., Esq.  
Johanna S. Gardner, Esq.