

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

APR 04 2016

Edgar W. Dickson, Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2015-002199

Faye P. Croft, Personally and as Trustee of the James A. Croft Trust; James A. Croft Trust; William A. Harbeson; Heyward G. Hutson; James Stephen Greene, Jr., South Carolina Public Interest Foundation; Summerville Preservation Society; and Dorchester County Taxpayers Association, individually, and on behalf of all others similarly situated.....Appellants,

v.

Town of Summerville and Town of Summerville Board of Architectural Review.....Respondents.

MOTION FOR EXTENSION

Respondents respectfully request a 30-day extension of the deadline for filing and serving Respondents' Initial Brief. This is Respondents' first request for an extension of this deadline. The current deadline is April 21, 2016, and the new deadline would be May 23, 2016.

The grounds for this motion are that Appellants have filed a proposed Initial Brief consisting of 67 pages, thus in excess of the number of allowable pages, and have simultaneously filed a Motion to Expand Page Limitation,

which is presently before the Court for consideration. Respondents need additional time to prepare their Initial Brief following the Court's ruling on Appellants' outstanding motion.

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Attorneys for Respondents

Charleston, South Carolina

March 31, 2016

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v.

Town of Summerville and Town of Summerville Board of Architectural Review.....Respondents.

PROOF OF SERVICE

I certify that on the date indicated below, I served Respondents' First Motion for Extension of time to file and serve Respondents' Initial Brief, by depositing a copy of it in the United States Mail, postage paid, on March 31, 2016, addressed to all attorneys of record as follows:

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Michael T. Rose, Esquire
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APR 04 2016

March 31, 2016

SC Court of Appeals

File No.: 20150083.000

VIA US MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211-1629

Re: Faye P. Croft, Personally and as Trustee of the James A. Croft Trust v. Town of
Summerville and Town of Summerville Board of Architectural Review
Case No.: 2015-002199

Dear Ms. Kitchings:

Enclosed please find the original and one (1) copy of Respondents' Motion for Extension of Time to File Initial Brief and Proof of Service regarding the above-referenced case. Please file the original documents and return a stamped, filed copy in the self-addressed, stamped envelope provided for your convenience. Also enclosed is our check in the amount of Twenty-Five (\$25.00) Dollars representing the administrative fee for this request.

Thank you for your assistance in this matter.

Very truly yours,

CLAWSON and STAUBES, LLC

T. A. Domin for

Timothy A. Domin

TAD/paa
Enclosures

cc: W. Andrew Gowder, Esq.
G. Waring Parker, Esq.
Michael T. Rose, Esq.
(All via US Mail & w/enclosures)

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