

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Tanya A. Gee, Circuit Court Judge

Appellate Case No. 2015-002532  
Case No. 2015-CP-40-03357

**RECEIVED**  
MAY 03 2016  
SC Court of Appeals

City of Columbia Board of Zoning Appeals.....Appellant,  
v.  
Christ Central Ministries.....Respondent.

**APPELLANT'S MOTION TO FILE BRIEF OUT OF TIME**

The Appellant's Brief was due on or before March 30, 2016. Appellant filed its brief timely. On April 28, 2016, Appellant received a letter from the Court stating that Appellant's Initial Brief contained deficiencies that must be corrected. Appellant was unaware that the deficiencies were not included with its initial filing. Appellant, by and through its attorney, hereby requests leave of the Court to file its initial brief out of time. Appellant believes the delay to be minimal in impact to the proceedings as the Court has not yet set this matter for a hearing and Respondent has not suffered any prejudice by the brief delay.

*Natalie O. Ham*  
\_\_\_\_\_  
Natalie Armstrong Ham  
Office of the City Attorney  
Post Office Box 667  
Columbia, South Carolina 29202  
(803) 737-4242  
Attorney for Appellant

May 3, 2016

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Christ Central Ministries.....Respondent,

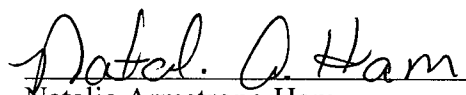
v.

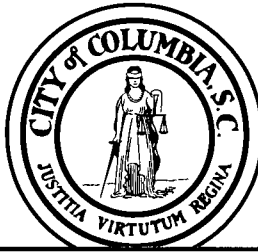
City of Columbia Board of Zoning Appeals.....Appellant,

**PROOF OF SERVICE**

I certify that I have served Appellant's Motion to File Brief Out of Time by depositing a copy of it in the United States Mail, postage prepaid, on May 3, 2016, addressed to: Jay Bender, Esquire, Baker Ravenel & Bender, LLP, Post Office Box 8057, Columbia, SC 29202.

May 3, 2016

  
\_\_\_\_\_  
Natalie Armstrong Ham  
Office of the City Attorney  
Post Office Box 667  
Columbia, South Carolina 29202  
(803) 737-4242  
Attorney for Appellant



We Are Columbia

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SC Court of Appeals

Office of the City Attorney  
Post Office Box 667 • Columbia, SC 29202 • (803) 737-4242 • Fax (803) 737-4250

May 3, 2016

**Via Hand-delivery**

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


RE: Christ Central Ministries v. City of Columbia Board of Zoning Appeals  
Appellate Case No.: 2015-002532  
Case No. 2015-CP-40-03357

Dear Ms. Kitchings:

Enclosed for filing are the original and six copies of Appellant's Motion to File Brief out of Time and the Proof of Service in the matter referenced above. Also enclosed is a \$25.00 check for the filing fee.

Please let me know if you have any questions or if I can be of any further assistance to you.

Sincerely,

  
Natalie Armstrong Ham  
Assistant City Attorney

NAH/jlh  
Enclosure(s) as Stated

cc: Jay Bender, Esquire