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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
The Honorable Marvin H. Dukes, III

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MAY 05 2016

Civil Action No.: 2012-CP-07-01394  
Appellate Case No.:

SC Court of Appeals

GRAYS HILL BAPTIST CHURCH:.....Respondent

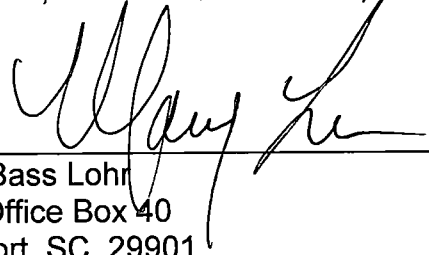
-vs-

BEAUFORT COUNTY AND THE UNITED STATES OF AMERICA.....Appellants

MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS' INITIAL BRIEF  
AND DESIGNATION OF MATTER

The Appellants, Beaufort County and the United States of America, respectfully request an extension of time to file Appellants' Initial Brief and Designation of Matter. If the motion is granted, the Initial Brief would be due at least thirty (30) days from the original due date of May 6, 2016. Due to the undersigned counsel's being in trial additional time is needed to complete the Initial Brief.

HOWELL, GIBSON & HUGHES, P.A.



By: \_\_\_\_\_  
Mary Bass Lohr  
Post Office Box 40  
Beaufort, SC 29901  
(843) 522-2400  
Attorney for Appellant  
Bar No: 16927

Beaufort, South Carolina

May 3, 2016

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
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CERTIFICATE OF SERVICE

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The undersigned counsel hereby certifies that she has served the foregoing Motion for Extension of Time to File Appellants' Initial Brief and Designation of Matter upon all counsel of record by affixing same with proper postage and placing same with the United States Postal Service on the 3<sup>rd</sup> day of May, 2016 addressed to the following:

H. Fred Kuhn, Jr., Esquire  
Moss, Kuhn & Fleming, P.A.  
Post Office Drawer 507  
Beaufort, SC 29901-0507

David M. Wunder  
67 Virginia Dare Drive  
Suite 206  
Camp Lejeune, NC 28547

HOWELL, GIBSON & HUGHES, P.A.

By: 

Mary Bass Lohr  
Post Office Box 40  
Beaufort, SC 29901  
(843) 522-2400  
Attorney for Appellants

Beaufort, South Carolina

May 3, 2016

HOWELL, GIBSON AND HUGHES, P.A.  
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J. ANDREW YOHO  
MATT WILLIAMS

JAMES S. GIBSON, JR \*  
Of Counsel

\* Certified Mediator

May 3, 2016

Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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MAY 05 2016  
SC Court of Appeals

Re: Grays Hill Baptist Church vs. Beaufort County  
Civil Action No.: 2012-CP-07-01394  
Our File No: 10369 MBL

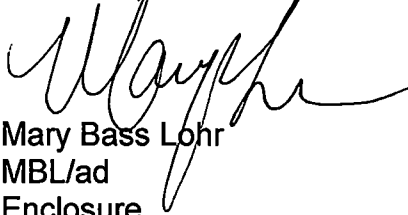
Dear Ms. Kitchings:

Please find enclosed herewith for filing Motion for Extension of Time to File Appellants' Initial Brief and Designation of Matter with regard to the above referenced matter. I would appreciate your filing the same and returning a filed clocked copy to me in the enclosed self-addressed, stamped envelope provided for your convenience.

With kindest regards, I am

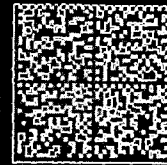
Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.



Mary Bass Lohr  
MBL/ad  
Enclosure

cc: H. Fred Kuhn, Jr.  
David M. Wunder



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