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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM PICKENS COUNTY  
Court of Common Pleas  
Robin B. Stilwell, Circuit Court Judge

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Case No. 2016-CP-39-100  
Appellate Case No. 2016-000762

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MRR Pickens, LLC,.....Appellant,

v.

County of Pickens and William Cato,  
Weldon Clark, Robert Ballentine, Jo  
Johnston, Dennis Reinert, and Bob Young,  
Individually and in their capacity as  
Appointed members of the Pickens County  
Planning Commission, .....Respondents,

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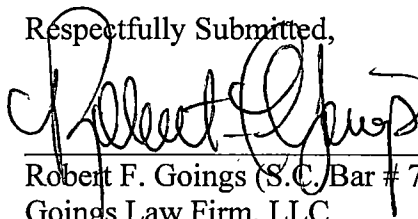
**APPELLANT’S MOTION FOR EXTENSION  
OF TIME TO FILE AND SERVE  
APPELLANT’S INITIAL BRIEF AND  
DESIGNATION OF MATTER**

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Appellant MRR Pickens, LLC hereby moves for an extension for an additional thirty (30) days to file the Appellant’s Initial Brief and Designation of Matter. Appellant’s Notice of Appeal was filed on April 12, 2016. Appellant’s Initial Brief is on or before May 9, 2016. However, due to Appellant’s counsels’ recent case scheduling and court appearances, Appellant respectfully requests an additional thirty (30) days, until June 8, 2016, to submit Appellant’s Initial Brief and Designation of Matter.

**[SIGNATURE PAGE TO FOLLOW]**

Respectfully Submitted,



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**ATTORNEYS FOR APPELLANT**

May 6, 2016

Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM PICKENS COUNTY  
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MRR Pickens, LLC,.....Appellant,

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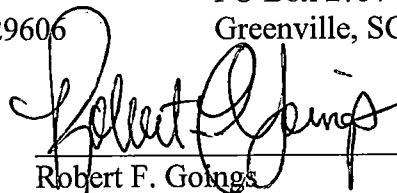
**PROOF OF SERVICE**

I certify that I have served a copy of Appellant's Motion for Extension of Time to File and Serve Appellant's Initial Brief and Designation of Matter on Respondents by mailing a copy of the same, via United States Mail, on May 6, 2016, to the following:

Gary W. Poliakoff, Esquire  
Poliakoff & Associates, P.A.  
PO Box 1571  
Spartanburg, SC 29304

Amy M. Snyder, Esquire  
Clarkson, Walsh, Terrell, &  
Coulter, P.A.  
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Matthew K. Johnson, Esquire  
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Smoak, & Stewart, P.C.  
PO Box 2757  
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Robert F. Gongs  
Counsel for Appellant

May 6, 2016  
Columbia, South Carolina



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May 6, 2016

**VIA UNITED STATES MAIL**

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

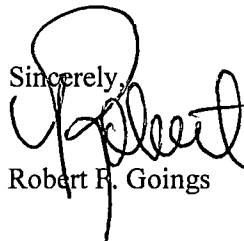
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Re: MRR Pickens, LLC v. County of Pickens and William Cato, Weldon Clark, Robert Ballentine, Jo Johnston, Dennis Reinert, and Bob Young, individually and in their official capacity as appointed members of the Pickens County Planning Commission  
C/A No.: 2016-CP-39-0100

Dear Ms. Kitchings:

Please find enclosed for filing the original and six (6) copies of Appellant's Motion for Extension to Time to File and Serve Appellant's Initial Brief and Designation of Matter and Proof of Service in the above-referenced matter. I am also enclosing a check in the amount of \$25.00 for the applicable filing fee. Please file the original and return the clocked copy to me in the envelope provided herewith.

Thank you for your assistance in this matter. Please feel free to contact me if you have any questions.

Sincerely,  
  
Robert R. Goings

RFG:lcc  
Enclosures

cc: Gary W. Poliakoff, Esquire  
Matthew K. Johnson, Esquire  
Amy M. Snyder, Esquire  
Jessica J. O. King, Esquire  
A. Keith McAlister, Jr., Esquire  
MRR Pickens, LLC (via Email)

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

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