

79722

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

MAY 31 2016

SC Court of Appeals

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

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

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 Appellant, Beaufort County, respectfully request an extension of time to file Appellants' Initial Brief and Designation of Matter. This motion is made due to the current due date, of May 30, 2016, falling in the middle of counsel's long standing vacation plans. If the motion is granted, the Initial Brief would be due at least thirty (30) days from the due date of May 30, 2016.

Counsel has conferred with all counsel of record in this matter and received their consent. This is the Appellant, Beaufort County's second request for an extension.

SIGNATURE PAGE FOLLOWS

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 26, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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

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

RECEIVED
MAY 31 2016
SC Court of Appeals

GRAYS HILL BAPTIST CHURCH.....Respondent

-vs-

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

CERTIFICATE OF SERVICE

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 26th 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

Lee E. Berlinsky
U.S. Department of Justice
151 Meeting Street, Suite 200
Charleston, SC 29402

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 26, 2016

HOWELL, GIBSON AND HUGHES, P.A.
ATTORNEYS AT LAW

Post Office Box 40
Beaufort, South Carolina 29901-0040
www.hghpa.com

STEPHEN P. HUGHES
PATRICK M. HIGGINS *
ROBERT W. ACHURCH III *
DAVID S. BLACK
MARY BASS LOHR
THOMAS A. BENDLE, JR.

J. ANDREW YOHO
MATT WILLIAMS

JAMES S. GIBSON, JR *
Of Counsel

* Certified Mediator

25 RUE DU BOIS
LADY'S ISLAND
BEAUFORT, SOUTH CAROLINA 29907

TELEPHONE: 843 - 522-2400
FAX NUMBER: 843 - 522-2429
E-Mail: mlohr@hghpa.com
WRITER'S DIRECT: 843-522-2428

RECEIVED

MAY 31 2016

SC Court of Appeals

May 26, 2016

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

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

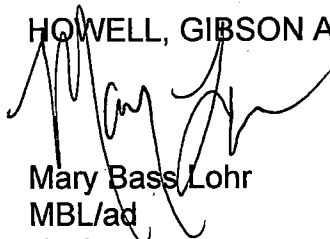
Dear Ms. Kitchings:

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
Lee E. Berlinsky



HOWELL, GIBSON & HUGHES, P.A.
POST OFFICE BOX 40
BEAUFORT, SC 29901
MBL

RECEIVED
MAY 31 2016
SC Court of Appeals

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

