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STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas
Mikell Scarborough, Master-in-Equity

Case No. 2010-CP-10-5449
App. No. 2015-002550

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JUN 14 2016

SC Court of Appeals

Nathan Bluestein, Ettaleah Bluestein, M.D.,
Theodore Albenesius, III, and Karen Albenesius,

Appellants,

v.

Town of Sullivan's Island and Sullivan's Island Town Council,

Respondents.

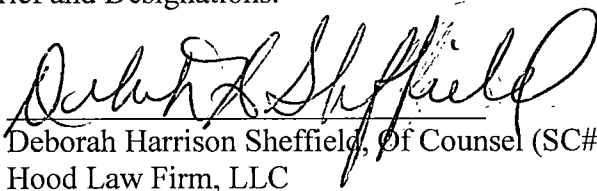
Motion for Extension of Time

Pursuant to Rule 240, SCACR, the Appellants Nathan Bluestein, Ettaleah Bluestein, M.D., Theodore Albenesius, III, and Karen Albenesius, by their undersigned Counsel, move the Court for an extension of time to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal. In support of this motion the Appellants would show unto the Court that:

1. Counsel for the Appellants received the last hearing transcript from the court reporter on April 14, 2016, which established a due date of Monday May 16, 2016, for the Appellants' initial brief and designations.
2. By letter of May 12, 2016, the undersigned Counsel for the Appellants requested a 30-day extension, which request was granted by the Court's order of May 17, 2016, extending the deadline until June 15, 2016.

3. Based on an end-of-school year family trip and other work commitments and deadlines, the undersigned does not anticipate that the initial brief can be completed by the current deadline.
4. Counsel for the Respondents have been consulted and they have consented as indicated by the email correspondence submitted with this motion.

Wherefore, the Appellants respectfully request a second extension of 30 days in which to file and serve their Initial Brief and Designations.


Deborah Harrison Sheffield, Of Counsel (SC# 2757)
Hood Law Firm, LLC
P.O. Box 1508
Charleston, SC 29402
(843) 577-4435
Attorneys for the Appellants

June 10, 2016

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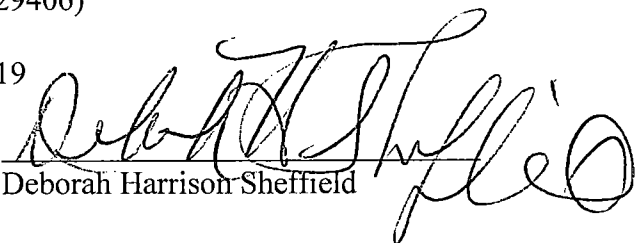
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Certificate of Service

The undersigned Counsel for the Appellants does hereby certify that on June 10, 2016, she served a copy of the Notice of Appeal on Counsel for Respondents, via U.S. Mail, first class, postage prepaid to the following address:

Hair, J. Brady
Van Raalte, Derk IV (SC # 9286)
Law Office of Brady Hair
2500 City Hall Lane (29406)
PO Box 61896
N. Charleston SC 29419


Deborah Harrison Sheffield

June 10, 2016

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

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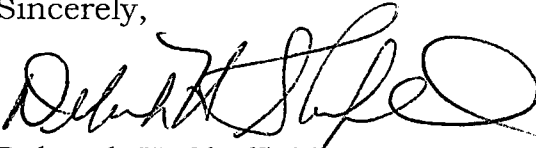
RE: Nathan Bluestein, Ettaleah Bluestein, M.D., Theodore Albenesius, III, and Karen Albenesius v. Town of Sullivan's Island and Sullivan's Island Town Council
Appeal No. 2015-002550

Dear Clerk:

By previous order of the Court, the Appellants received a 30-day extension for their Appellants' initial brief and designations which are due Monday, June 15, 2016. Enclosed for filing is the original and six (6) copies of a motion for a second extension copies along with my certificate of service and the \$25.00 filing fee. We have contacted Counsel for the Respondents regarding this motion and they have graciously consented as indicated by enclosed printout from our email correspondence.

Thank you for your consideration of this request.

Sincerely,



Deborah H. Sheffield

cc: J. Brady Hair
Derk Van Raalte, IV
Law Offices of J. Brady Hair
PO Box 61896
N. Charleston SC 29419

Subj: **Fwd: Bluestein/Albenesius v. Town of Sullivan's Island**
Date: 6/6/2016 4:51:44 P.M. Eastern Daylight Time
From: walker.barnes@hoodlaw.com
To: dhsheffieldatty@aol.com, deborah.sheffield@hoodlaw.com

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JUN 14 2016

SC Court of Appeals

Begin forwarded message:

From: Derk Van Raalte <derk@bradyhair.com>
Date: June 6, 2016 at 16:29:09 EDT
To: Walker Barnes <walker.barnes@hoodlaw.com>
Cc: Brady Hair <Brady@bradyhair.com>, Julie Dunn <julie.dunn@hoodlaw.com>, Bobby Hood <bobby.hood@hoodlaw.com>
Subject: Re: Bluestein/Albenesius v. Town of Sullivan's Island

Walker - the Town consents. DVR

Sent from my iPhone

On Jun 6, 2016, at 9:31 AM, Walker Barnes <walker.barnes@hoodlaw.com> wrote:

Brady/Derk: would y'all be willing to consent to a 30-day extension to our deadline to file our Initial Brief/Designations? Our appellate lawyer has made the request due to scheduling issues on her end. I realize this is the second extension, but I hope y'all will consent.

Thanks,
Walker

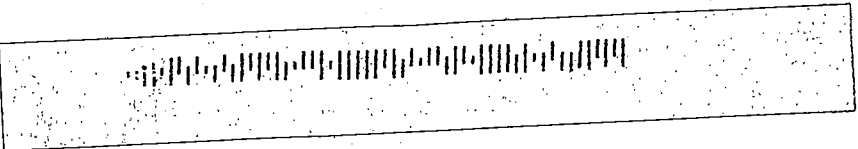
Walker Barnes
Attorney
Walker.Barnes@hoodlaw.com

<image001.jpg>

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P.O. Box 1508
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Hood Law Firm
172 Meeting St.
Charleston, SC 29401

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