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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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JUL 27 2016

SC Court of Appeals

Trial Court Case No.: 2012-CP-07-01394, 2010-CP-07-04844
2008-CP-07-01114
Appellate Case No.: 2016-000687

Grays Hill Baptist Church,	Respondent
v.	
Beaufort County and The Beaufort County Zoning Board of Appeals,	Defendants,
And	
The United States of America,	Defendant-Intervenor,
Of Which Beaufort County and The United States of America are	Appellants.

NOTICE OF MOTION AND MOTION FOR
EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF
AND DESIGNATION OF MATTER TO BE INCLUDED
IN RECORD ON APPEAL

The Respondent, Grays Hill Baptist Church, would respectfully request an extension of time within which to file the Initial Brief of the Respondent and the Respondent's Designation of Matter to be Included in the Record on Appeal. These matters are currently due to be filed no later than July 29, 2016. The Respondent would respectfully request a thirty (30) day extension of time in which to file the same.

This motion is made upon the ground that an extension as requested would be in the best interest of justice, and would not prejudice the Appellants.

It is accordingly respectfully requested that the Respondents be granted a thirty (30) day extension of time in which to file the Respondent's Initial Brief and the Respondent's Designation of Matter to be Included in the Record on Appeal.

MOSS, KUHN, FLEMING & SMITH, P.A.

By: 

H. Fred Kuhn, Jr.
1501 North Street
Post Office Drawer 507
Beaufort, South Carolina 29901
(843)524-3373
(843)524-1302- FX

Beaufort, South Carolina
July 25, 2016

Attorneys for Respondent

CERTIFICATE OF SERVICE

Undersigned certifies that the **Notice of Motion and Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal**, to which this certificate is affixed, was served upon the party(s) to this action by hand delivery or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

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JUL 27 2016


SC Court of Appeals

Mary Bass Lohr, Esquire
Howell, Gibson & Hughes, P.A.
Post Office Box 40
Beaufort, South Carolina 29901

James Landis, Esquire
Lowcountry Counsel
Eastern Area Counsel Office
Commandant's Legal
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MCAS
Beaufort, South Carolina 29904

David M. Wunder
Environmental Counsel
Eastern Area Counsel Office
67 Virginia Dare Drive, Suite 206
Camp Lejeune, North Carolina 28547

in a post office or official depository under the exclusive care and custody of the United States Postal Service, on July 25, 2016.

By: 
Sue Radford
Secretary for H. Fred Kuhn, Jr.

LAW OFFICES

MOSS, KUHN, FLEMING & SMITH, P.A.

JAMES H. MOSS
H. FRED KUHN, JR.
CORY H. FLEMING*
KIMBERLY L. SMITH

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TELEPHONE 843-524-3373
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*ALSO MEMBER OF GA BAR

July 25, 2016

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JUL 27 2016
SC Court of Appeals

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

RE: Grays Hill Baptist Church v. Beaufort County
Case Nos: 2012-CP-07-01394, 2010-CP-07-04844 and 2008-CP-07-0-1114
Appellate Case No.: 2016-000687

Dear Mrs. Kitchings:

Enclosed please find the original and seven (7) copies of the Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in Record on Appeal regarding the above-referenced matter along with my firms check in the amount of \$25.00 for the filing of the same. I would appreciate your returning one (1) filed copy to me in the enclosed self-addressed stamped envelope. By copy of this letter I am serving a copy of this motion on all counsel of record.

With kindest regards, I am

Very truly yours,

MOSS, KUHN & FLEMING:

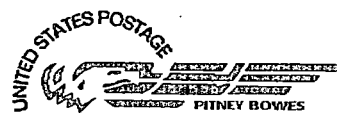
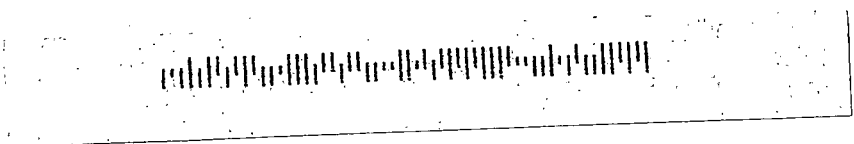

H. Fred Kuhn, Jr.

HFKjr:sr
Enclosures

cc: Mary Bass Lohr, Esquire (w/enc.)
James Landis, Esquire (w/enc.)
David M. Wudner, Esquire (w/enc.)



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MOSS, KUHN & FLEMING, P.A.

HPK

ATTORNEYS AT LAW
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 Beaufort, SC 29901-0507
 (843) 524-3373

Grays Hill

To:

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

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