

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Joseph M. Strickland, Master-in-Equity

**RECEIVED**

AUG 08 2016

SC Court of Appeals

Case No. 2016-001440

Carolina Chloride, Inc., .....Appellant,

v.

South Carolina Department of Transportation, .....Respondent.

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

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF  
APPEALS:

Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules,  
counsel for Appellant Carolina Chloride, Inc., LLC respectfully moves the  
Court for an extension of time to file Appellant’s Initial Brief and  
Designation of Matter. The Initial Brief and Designation of Matter are due on  
August 8, 2016. Counsel respectfully requests a thirty-day extension of time.

Accordingly, the Initial Brief and Designation of Matter would be due on September 7, 2016.

Counsel asserts the extension is necessary due to counsel's current caseload and schedule. This is counsel's first motion for an extension of time to file the Initial Brief and Designation of Matter.

Counsel appreciates the Court's attention and its accommodation regarding this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.



By: \_\_\_\_\_

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ATTORNEYS FOR APPELLANT

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

Columbia, South Carolina  
August 8, 2016

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Court of Common Pleas

AUG 08 2016  
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Joseph M. Strickland, Master-in-Equity

\_\_\_\_\_  
Case No. 2016-001440  
\_\_\_\_\_

Carolina Chloride, Inc., .....Appellant,

v.

South Carolina Department of Transportation, .....Respondent.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

I hereby certify that I served Appellant’s Motion for Extension of Time to File Appellant’s Initial Brief and Designation of Matter upon all parties, by placing a copy in the United States mail, postage prepaid, to the below listed parties on August 8, 2016, addressed to the following:

Beacham O. Brooker, Jr.  
South Carolina Department of  
Transportation  
Post Office Box 191  
Columbia, SC 29202-0191  
***Counsel for Respondent***

Edward D. Sullivan  
SULLIVAN LAW FIRM, PC  
Post Office Box 11714  
Columbia, South Carolina 29211  
***Co-counsel for Appellant***

Respectfully submitted,

COLLINS & LACY, P.C.



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ATTORNEYS FOR APPELLANT

PROOF OF SERVICE - MOTION FOR  
EXTENSION OF TIME TO FILE  
APPELLANT'S INITIAL BRIEF AND  
DESIGNATION OF MATTER

Columbia, South Carolina  
August 8, 2016



Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

August 8, 2016

**VIA HAND DELIVERY**

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**

AUG 08 2016

SC Court of Appeals

**Re: Carolina Chloride, Inc. v. South Carolina Department of Transportation**  
**Civil Action No. 2016-001440**  
**C&L File No. 001114-00102**

Dear Ms. Kitchings:

Please find enclosed the original and seven copies of Appellant's Motion for Extension of Time to file its Initial Brief and Designation of Matter in connection with the above referenced matter. Also enclosed is our firm's check in the amount of \$25.00, representing the filing fee of same. Please file the original and return a clocked copy to us via our courier.

By copy of this letter to counsel of record, we are serving same on him.

Thank you for your time and attention. Should you have any questions or concerns, please do not hesitate to contact us.

Respectfully,

Christian Stegmaier

CS/mmm

Enclosures

cc: Beacham O. Brooker, Jr., Esquire  
Edward D Sullivan, Esquire  
Robert H. Morgan