

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Larry B. Hyman, Jr.
Circuit Court Judge

RECEIVED
AUG 12 2016
SC Court of Appeals

APPELLATE CASE NO. 2015-001868

SKYDIVE MYRTLE BEACH, INC.Appellant
v.

HORRY COUNTY..... Respondent

**MOTION TO THE COURT OF APPEALS FOR JOINT EXTENSION (SECOND)
TO FILE BOUND RECORDS ON APPEAL AND FINAL BRIEF OF
APPELLANT AND FINAL REPLY BRIEF OF APPELLANT AND
APPELLANT'S REQUEST TO AMEND ITS RECORD ON APPEAL PURSUANT
TO RULE 221, SCACR**

COMES NOW THE Appellant Skydive Myrtle Beach, Inc. and Respondent Horry County, who by and through their undersigned counsel would move this Honorable Court for a Joint (second) twenty (20) day extension to file and serve the bound records on appeal and the Final Brief of Appellant and Final Reply Brief of Appellant. Appellant also requests, pursuant to Rule 221, SCACR, to amend its Record on Appeal, filed on July 8, 2016.

Robert B. Varnado
Robert B. Varnado
BROWN & VARNADO LLC
P.O. Box 1127
Mount Pleasant, South Carolina 29465
Attorney for Appellants

Robert B. Varnado
fu Michael W. Battle, Esquire *W/ power via*
Battle Law Firm *email of 8.9.16*
P.O. Box 530
Conway, South Carolina 29528

Arrigo P. Carotti, Esquire
Horry County Attorney
1301 2nd Avenue
Conway, SC 29526
Attorneys for Respondent

August 9, 2016



Kat Garvin

From: Kat Garvin
Sent: Tuesday, August 09, 2016 3:59 PM
To: 'Mike Battle'
Subject: RE: Skydive
Attachments: Second Joint Motion for Extension - 20 days.docx

My apologies. I thought you were also seeking an extension. Please see the attached.

Katharina (Kat) Garvin
Litigation Paralegal

From: Mike Battle [mailto:MBattle@battlelawsc.com]
Sent: Tuesday, August 09, 2016 3:25 PM
To: Kat Garvin <kgarvin@brown-varnado.com>
Subject: RE: Skydive

You have permission to sign my name to the motion. However, FINAL REPLY BRIEF OF RESPONDENT is not correct. It should be FINAL REPLY BRIEF OF APPELLANT. Please correct before you submit. Thanks. Mike Battle

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<p>MICHAEL W. BATTLE BATTLE LAW FIRM, LLC P.O. BOX 530 1200 MAIN STREET CONWAY, SOUTH CAROLINA 29528 (843)248-4321 mbattle@battlelawsc.com</p>
--

From: Kat Garvin [mailto:kgarvin@brown-varnado.com]
Sent: Tuesday, August 09, 2016 1:51 PM
To: Mike Battle
Subject: Skydive

Mr. Battle –
Attached please find a Second Joint Motion for Extension and our Request to Amend the ROA in the above matter. Please let me know if it meets with your approval and if we have permission to sign on your behalf.
Thank you

Katharina (Kat) Garvin
Litigation Paralegal

Brown & Varnado, LLC

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BROWN & VARNADO LLC

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KATHARINA F. GARVIN
DIRECT: (843) 737-7300
EMAIL: kgarvin@brown-varnado.com

August 9, 2016

Via US Mail & Facsimile

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201
Fax No.: 803-734-1839

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AUG 12 2016

SC Court of Appeals

RE: *Skydive Myrtle Beach, Inc. v. Horry County*
Appellate Case No.: 2015-001868
Our File No.: 6247 - 1

Dear Ms. Abbott Kitchings:

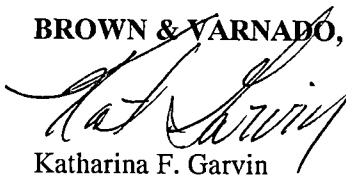
This firm represents the Appellant Skydive Myrtle Beach, Inc. (Appellant) in the above referenced matter. Appellants and Respondents respectfully submit a **Joint (second) Motion requesting a twenty (20) day extension to file and serve the bound records on appeal and the Final Brief of Appellant and Final Reply Brief of Appellant and Appellant's Request to Amend its Record on Appeal Pursuant to Rule 221, SCACR.** Our firm's check in the amount of \$25.00 is enclosed for the required filing fee.

Should you have any questions or require anything additional, please do not hesitate to contact me.

Thank you and with kindest regards, I remain

Very truly yours,

BROWN & VARNADO, LLC



Katharina F. Garvin

/kfg

Enclosure(s): as stated

cc: Arrigo P. Carotti, Esquire (via US Mail & Email)
Michael W. Battle, Esquire (via US Mail & Email)

Brown & Varnado, LLC

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CHARLESTON SC 294

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The Honorable Jenny Abbott Kitchings

Clerk of Court

South Carolina Court of Appeals

1220 Senate Street

Columbia, South Carolina 29201

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SC Court of Appeals

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