

80571

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas
Robin B. Stilwell, Circuit Court Judge

RECEIVED
AUG 12 2016
SC Court of Appeals

Case No. 2016-CP-39-100
Appellate Case No. 2016-000762

MRR Pickens, LLC,.....Appellant,

v.

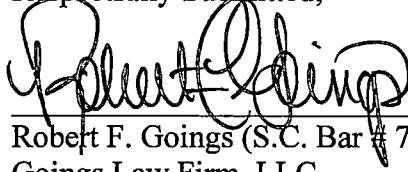
County of Pickens and William Cato,
Weldon Clark, Robert Ballentine, Jo
Johnston, Dennis Reinert, and Bob Young,
Individually and in their capacity as
Appointed members of the Pickens County
Planning Commission,Respondents,

**APPELLANT'S MOTION FOR EXTENSION
OF TIME TO FILE AND SERVE
APPELLANT'S REPLY BRIEF TO
RESPONDENTS' INITIAL BRIEF**

Appellant MRR Pickens, LLC hereby moves for an extension for an additional ten (10) days to file the Appellant's Reply Brief to Respondents' Initial Brief. Appellant's Reply Brief is now due on or before August 15, 2016. However, due to Appellant's counsels' recent case scheduling and court appearances, Appellant respectfully requests an additional ten (10) days, until August 24, 2016, to submit Appellant's Reply Brief.

[SIGNATURE PAGE TO FOLLOW]

Respectfully Submitted,



Robert F. Goings (S.C. Bar # 74855)
Goings Law Firm, LLC
914 Richland Street, Suite A-101
Columbia, South Carolina 29201
Telephone: (803) 350-9230
Facsimile: (877) 789-6340
Email: rgoings@goingslawfirm.com

WILLIAMS MULLEN
Jessica J.O. King (S.C. Bar #11202)
A. Keith McAlister, Jr. (S.C. Bar # 78213)
1441 Main Street, Suite 1250
Columbia, South Carolina 29201
Telephone: (803) 567-4000
Facsimile: (803) 567-4601
Email: jking@williamsmullen.com
Email: kmcalister@williamsmullen.com

ATTORNEYS FOR APPELLANT

August 10, 2016
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

AUG 12 2016

SC Court of Appeals

APPEAL FROM PICKENS COUNTY
Court of Common Pleas
Robin B. Stilwell, Circuit Court Judge

Case No. 2016-CP-39-100
Appellate Case No. 2016-000762

MRR Pickens, LLC,.....Appellant,

v.

County of Pickens and William Cato,
Weldon Clark, Robert Ballentine, Jo
Johnston, Dennis Reinert, and Bob Young,
Individually and in their capacity as
Appointed members of the Pickens County
Planning Commission,Respondents,

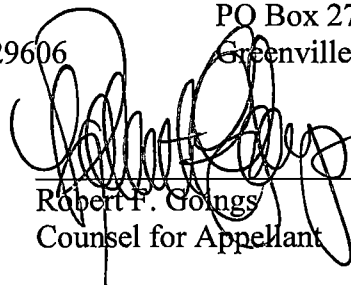
PROOF OF SERVICE

I certify that I have served a copy of Appellant’s Motion for Extension of Time to File and Serve Appellant’s Initial Brief and Designation of Matter on Respondents by mailing a copy of the same, via United States Mail, on August 10, 2016, to the following:

Gary W. Poliakoff, Esquire
Poliakoff & Associates, P.A.
PO Box 1571
Spartanburg, SC 29304

Amy M. Snyder, Esquire
Clarkson, Walsh, Terrell, &
Coulter, P.A.
PO Box 6728
Greenville, SC 29606

Matthew K. Johnson, Esquire
Ogletree, Deakins, Nash,
Smoak, & Stewart, P.C.
PO Box 2757
Greenville, SC 29602


Robert F. Goings
Counsel for Appellant

August 10, 2016
Columbia, South Carolina



914 RICHLAND STREET
SUITE A-101
POST OFFICE BOX 436 (29202)
COLUMBIA, SC 29201
P 803.350.9230
F 877.789.6340
E rgoings@goingslawfirm.com

August 10, 2016

RECEIVED

AUG 12 2016

SC Court of Appeals

VIA UNITED STATES MAIL

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

Re: MRR Pickens, LLC v. County of Pickens and William Cato, Weldon Clark, Robert Ballentine, Jo Johnston, Dennis Reinert, and Bob Young, individually and in their official capacity as appointed members of the Pickens County Planning Commission
C/A No.: 2016-CP-39-0100

Dear Ms. Kitchings:

Please find enclosed for filing the original and six (6) copies of Appellant's Motion for Extension to Time to File and Serve Appellant's Reply Brief to Respondents' Initial Brief in the above-referenced matter. I am also enclosing a check in the amount of \$25.00 for the applicable filing fee. Please file the original and return the clocked copy to me in the envelope provided herewith.

Thank you for your assistance in this matter. Please feel free to contact me if you have any questions.

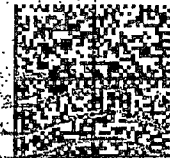
Sincerely,


Robert F. Goings

RFG:lcc

Enclosures

cc: Gary W. Poliakoff, Esquire
Matthew K. Johnson, Esquire
Amy M. Snyder, Esquire
Jessica J. O. King, Esquire
A. Keith McAlister, Jr., Esquire
MRR Pickens, LLC (*via Email*)



02-12
\$001.990
0001982381
AUG 10 2016
MAILED FROM ZIP CODE 29201

COLUMBIA SC 292

WED 10 AUG 2016 PM



Goings Law Firm

914 RICHLAND STREET
SUITE A-101
POST OFFICE BOX 436 (29202)
COLUMBIA, SC 29201

RECEIVED

AUG 12 2016
SC Court of Appeals

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