

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Tanya A. Gee, Circuit Court Judge

Appellate Case No. 2015-002532
Case No. 2015-CP-40-03357

RECEIVED
AUG 18 2016
SC Court of Appeals

City of Columbia Board of Zoning Appeals.....Appellant,

v.

Christ Central Ministries.....Respondent.

APPELLANT’S MOTION TO FILE RECORD ON APPEAL OUT OF TIME

The Appellant’s Reply Brief was filed and served on July 7, 2016. Pursuant to Rule 210, SCRCF, within thirty days after the service of the last brief, the appellant shall serve a copy of the Record on Appeal on each party who served a brief making the Record on Appeal due on August 8, 2016. Appellant, by and through its attorney, hereby requests leave of the Court to file its initial brief out of time. Appellant believes the delay to be minimal in impact to the proceedings as the Court has not yet set this matter for a hearing and Respondent has not suffered any prejudice by the brief delay.



Natalie Armstrong Ham
Office of the City Attorney
Post Office Box 667
Columbia, South Carolina 29202
(803) 737-4242
Attorney for Appellant

August 18, 2016

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PROOF OF SERVICE

I certify that I have served Appellant's Motion to File Record on Appeal Out of Time by depositing a copy of it in the United States Mail, postage prepaid, on August 18, 2016, addressed to: Jay Bender, Esquire, Baker Ravenel & Bender, LLP, Post Office Box 8057, Columbia, SC 29202.

August 18, 2016



Natalie Armstrong Ham
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We Are Columbia

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August 18, 2016

Via Hand-delivery

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

RE: Christ Central Ministries v. City of Columbia Board of Zoning Appeals
Appellate Case No.: 2015-002532
Case No. 2015-CP-40-03357

Dear Ms. Kitchings:

Enclosed for filing are the original and six copies of Appellant's Motion to File Record on Appeal out of Time and the Proof of Service in the matter referenced above. Also enclosed is a \$25.00 check for the filing fee.

Please let me know if you have any questions or if I can be of any further assistance to you.

Sincerely,

Natalie Armstrong Ham
Assistant City Attorney

NAH/jlh
Enclosure(s) as Stated

cc: Jay Bender, Esquire