

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Master-in-Equity

Case No. 2016-001440

Carolina Chloride, Inc.,Appellant,

v.

South Carolina Department of Transportation,Respondent.

**SECOND 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
September 7, 2016. Counsel respectfully requests a thirty-day extension of

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

Counsel has contacted Respondent's counsel and he consents to this motion. Counsel asserts the extension is necessary due to counsel's current caseload and schedule. This is counsel's second and last motion for an extension of time to file the Initial Brief and Designation of Matter.

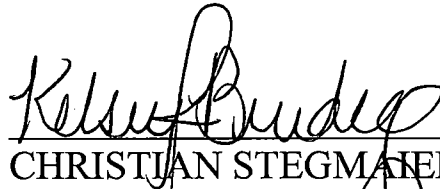
Counsel appreciates the Court's attention and its accommodation regarding this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.

By:



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ATTORNEYS FOR APPELLANT

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

Columbia, South Carolina
September 7, 2016

THE STATE OF SOUTH CAROLINA
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Case No. 2016-001440

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v.

South Carolina Department of Transportation,Respondent.

PROOF OF SERVICE

I hereby certify that I served Appellant’s Second 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 September 7, 2016, addressed to the following:

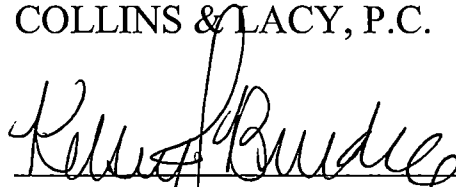
Beacham O. Brooker, Jr.
South Carolina Department of
Transportation
Post Office Box 191
Columbia, SC 29202-0191
Counsel for Respondent

Edward D. Sullivan
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Post Office Box 11714
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Co-counsel for Appellant

Respectfully submitted,

COLLINS & LACY, P.C.

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ATTORNEYS FOR APPELLANT

PROOF OF SERVICE – SECOND
MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT’S INITIAL
BRIEF AND DESIGNATION OF
MATTER

Columbia, South Carolina
September 7, 2016



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SC Court of Appeals

September 7, 2016

VIA HAND DELIVERY

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

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 Second 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.

Sincerely,

Kelsey J. Brudvig

KJB/mmm

Enclosures

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

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VIA HAND DELIVERY

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

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