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Phillip S. Ferderigos, Partner
pferderigos@barnwell-whaley.com

November 3, 2016

RECEIVED

NOV -7 2016

S.C. SUPREME COURT

The Honorable Daniel E. Shearouse
Clerk of Court, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211-1330

RE: Tipperary Sales d/b/a La-Z-Boy Furniture Gallery, Respondent,
v.
South Carolina Department of Transportation; South Carolina Department of Health and Environmental Control; City of North Charleston; Charleston Water System; Associated Developers, Inc.; Parkhill, LLC, Defendants,
Of Whom City of North Charleston, Petitioner
App. Case No. 2016-001964

Dear Mr. Shearouse:

I represent the Petitioner, City of North Charleston, in the above-referenced matter. Please accept this letter as my request for a fifteen (15) day extension to file my Reply to Respondent's Return to the Petition for Writ of Certiorari. The additional time is needed to adequately prepare a Reply due to scheduling conflicts. Also, Yancey McLeod, counsel for Respondent La-Z-Boy, has graciously agreed to the extension

The Return is currently due today, November 3, 2016. According to my calculation, a 15 day extension would make the new deadline for the Reply on Friday, November 18, 2016. I am also enclosing a check in the amount of \$25 for the motion filing fee as well as a Certificate of Service.

Thank you for your assistance.

With kind regards,

Phillip S. Ferderigos

Enc.

Cc: Michael S. Seekings, Esq., and Yancey A. McLeod, Esq.
All Counsel of Record

PSF/bbm

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www.barnwell-whaley.com

SOUTH CAROLINA OFFICE:

288 Meeting Street, Suite 200, Charleston, SC 29401
P 843.577.7700 F 843.577.7708

NORTH CAROLINA OFFICE:

1427 Military Cutoff Road, Suite 202, Wilmington, NC 28403
P 910.679.1388 F 910.679.4663

REPRESENTING CLIENTS IN ALL COURTS IN SOUTH CAROLINA AND NORTH CAROLINA AND IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

**IN THE STATE OF SOUTH CAROLINA
In the Supreme Court**

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2012-CP-10-06922
Appellate Tracking No. 2016-001964

Opinion No. 2016-UP-351, filed June 30, 2016

Tipperary Sales d/b/a La-Z-Boy Furniture GalleryRespondent,

v.

South Carolina Department of Transportation; South Carolina Department
of Health and Environmental Control; City of North Charleston;
Charleston Water System; Associated Developers, Inc., Parkhill, LLC Defendants,

Of Whom
City of North Charleston..... Petitioner.

PROOF OF SERVICE

I hereby certify that on the 3rd day of November, 2016, I mailed a copy of the foregoing Letter Requesting 15-day Extension to file Reply to Respondent's Return, with sufficient postage, correctly addressed as follows:

The Honorable Daniel Shearouse
Clerk, Supreme Court of SC
P.O. Box 11330
Columbia, SC 29211-1330

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

Michael S. Seekings, Esq.
Yancey A. McLeod III, Esq.

Leath Bouch Crawford & Von Keller
PO Box 59
Charleston, SC 29402

Jason A. Daigle, Esq.
Young Clement Rivers
25 Calhoun Street, Suite 400
Charleston, SC 29401

Roy P. Maybank, Esq.
Maybank Law Firm, LLC
PO Box 12579
Charleston, South Carolina 29407

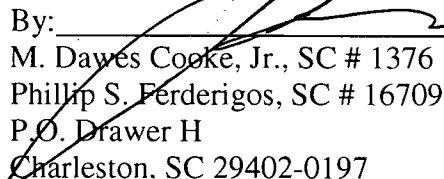
Andrew S. Halio, Esq.
Halio & Halio
13 North Adgers Wharf
Charleston, South Carolina 29401

G. Wade Cooper, Esq.
Buyck & Sanders, LLC
PO Box 2424
Mt. Pleasant, South Carolina 29465

Leslie S. Riley, Esq.
Lucas C. Padgett, Jr., Esq.
McNair Law Firm, P.A.
PO Box 1431
Charleston, South Carolina 29402

Duke R. Highfield, Esq.
Benjamin A. Traywick, Esq.
Brandt R. Horton, Esq.
Young Clement Rivers, LLP
PO Box 993
Charleston, South Carolina 29402

Barnwell Whaley Patterson & Helms, LLC

By: 
M. Dawes Cooke, Jr., SC # 1376
Phillip S. Ferderigos, SC # 16709
P.O. Drawer H
Charleston, SC 29402-0197
(843) 577-7700

**Counsel for Petitioner
City of North Charleston**



The Supreme Court of South Carolina

Phillip S. Ferderigos
PO Drawer H
Charleston SC 29402

11/07/2016

RECEIPT #81482

Case No: 2016-001964
Case Short Title: Tipperary Sales v. South Carolina Department of Transportation
Event: Motion - Extension of Time (1st)
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 36160
Check/Money Order Date: 11/03/2016
Comments:

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PATTERSON & HELMS LLC

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P.O. Drawer H, Charleston, SC 29402-0197

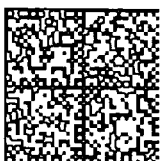
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The Honorable Daniel E. Shearouse

Clerk of Court, Supreme Court of South Carolina

P.O. Box 11330

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