



Phillip S. Ferderigos, Partner
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November 3, 2016

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NOV 07 2016

SC Court of Appeals

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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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

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SC Court of Appeals

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

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**Counsel for Petitioner
City of North Charleston**

**BARNWELL
WHALEY**

PATTERSON & HELMS LLC

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YEARS ■

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

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



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