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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

NOV 08 2016

SC Court of Appeals

J.C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2016-002001
Case No. 2016-CP-10-1106

241-243 E. Bay Holdings, LLC,Appellant,

v.

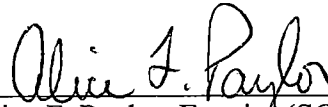
The City of Charleston, The Board of Zoning Appeals-Zoning for the City of Charleston
and Rainbow Market Group, LLC, Respondents. **Re: 2 Anson Street**
And 241-243 E. Bay Holdings, LLC, Appellant, v. The City of Charleston, The Board of
Zoning Appeals-Zoning for the City of Charleston and Rainbow Market
Group, LLC,Respondents.

Re: 40-46 Market Street

**APPELLANT’S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Please take notice that the Appellant hereby requests a 30-day extension of time to file their Initial Brief and Designation of Matter. Additional time is necessary due to ongoing case load demands. This is the Appellant’s first request for an extension and counsel for the Appellant has been consulted and has no objection to this request. With the requested extension, Appellant’s Initial Brief and Designation of Matter would be due December 13, 2016.

Respectfully submitted,



Alice F. Paylor, Esquire (SC # 4380)
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Attorney for Appellant

THE STATE OF SOUTH CAROLINA
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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time on Respondent by
depositing a copy of it in the United States Mail, postage prepaid on November 4, 2016,
addressed to attorney of record as follows:

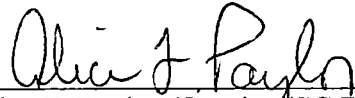
Timothy Domin
Clawson & Staubes, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492-8144
(843)577-2026

*Attorney for Respondents The City of Charleston
And Board of Zoning Appeals-Zoning for the City of Charleston*

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Charleston, South Carolina
November 4, 2016

ROSEN | HAGOOD

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

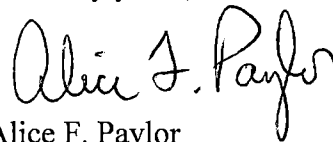
Re: *241-243 E. Bay Holdings, LLC v. City of Charleston, et al.*
2 Anson Street / 40-46 Market Street
Appellate Case. No. 2016-002001

Dear Mrs. Kitchings:

Enclosed please find the original and seven copies of Appellant's Motion for Extension of Time to File Initial Brief and Designation of Matter in the above-referenced matter, along with our Proof of Service and filing fee check. We would appreciate it if you would please file the original and return a clocked-in copy to us in the enclosed self-addressed, stamped envelope.

Please do not hesitate to contact me if you have any questions. Thank you in advance for your assistance in this matter.

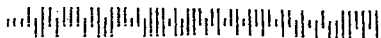
Sincerely yours,



Alice F. Paylor

RSD/dlw
Enclosure

cc: Timothy Domin, Esquire (w/encl)
Charles Baker, III, Esquire (w/encl)



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South Carolina Court of Appeals
Post Office Box 11629
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