

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

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

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DEC 12 2016

SC Court of Appeals

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.

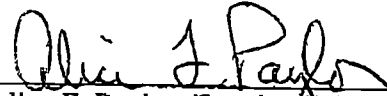
Re: 40-46 Market Street

**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. This is the Appellant's second request for an extension of time, and the Appellant does not make this request for purposes of delay or any other improper purpose; the parties have mutually agreed to this requested further extension of time to provide time for the parties to continue to pursue on-going settlement discussions. With the requested extension, Appellant's Initial Brief and Designation of Matter would be due January 14, 2016.

;

Respectfully submitted,



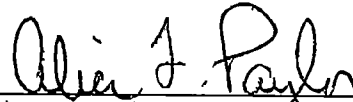
Alice F. Paylor, Esquire (SC # 4380)  
Rosen, Rosen & Hagood, LLC  
151 Meeting Street, Suite 400  
Charleston, SC 29401  
Telephone: (843)577-6726  
Email: [apaylor@rrhlawfirm.com](mailto:apaylor@rrhlawfirm.com)

Attorney for Appellant

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Charleston, SC 29402  
(843) 722-3400

*Attorney for Respondent Rainbow Market Group, LLC*

ROSEN, ROSEN & HAGOOD, LLC



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Charleston, South Carolina  
December 12, 2016

DATE	DESCRIPTION	INVOICE #	AMOUNT	DEDUCTION	NET AMOUNT
12/12/16	111.00 Clerk of South Carolina Court of Appeals Filing Fee (9629)		25.00		25.00

CHECK DATE	CONTROL NUMBER	TOTALS	Gross:	Ded:	Net:
12/12/16	14636		25.00		25.00

DOCUMENT INCLUDES VISIBLE FIBERS, CHEMICAL REACTIVE PROPERTIES AND FEATURES A FOIL HOLOGRAM

**ROSEN, ROSEN & HAGOOD, LLC**  
ATTORNEYS AT LAW  
OPERATING ACCOUNT  
R.D. BOX 893  
CHARLESTON, SC 29402

66-1203-531

DATE: 12/12/16  
CHECK: 14636  
AMOUNT: \*\*\*\*\*\$25.00

PAY TO THE ORDER OF: Clerk of South Carolina Court of Appeals  
P.O. Box 11629  
Columbia SC 29211

TWENTY-FIVE & 00/100 DOLLARS

AMOUNTS OVER \$100,000.00 REQUIRE 2 SIGNATURES  
VOID AFTER 180 DAYS

*[Signature]*  
AUTHORIZED SIGNATURES

WATERMARK PAPER - HOLD TO LIGHT TO VIEW  
PAPER CONTAINS TONER ADHESION PROPERTIES  
HEAT SENSITIVE RED IMAGE DISAPPEARS WITH HEAT

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SC Court of Appeals

**ROSEN, ROSEN & HAGOOD, LLC**

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Charleston, SC 29401

Tel: (843) 577-6726

Fax: (843) 724-8036

FAX TRANSMISSION

ATTORNEY-CLIENT PRIVILEGE

Date Sent: Dec 12 2016

Sent From: Atty Alice S. Taylor

Sent To: Clerk - COURT of Appeals

Fax Number: 803-734-1839

Number of Pages (including cover page): 7

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SC Court of Appeals

MESSAGE

Appellate  
Case

2016-002001

THE INFORMATION CONTAINED IN THIS FACSIMILE IS CONFIDENTIAL AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHOM IT IS ADDRESSED. IF YOU ARE NOT THE INTENDED RECIPIENT OR THE PERSON RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, DO NOT USE OR DISCLOSE THIS FACSIMILE. IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE, AND RETURN THE ORIGINAL TO ROSEN, ROSEN & HAGOOD VIA THE U.S. POSTAL SERVICE. THANK YOU.

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Re: 40-46 Market Street

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 December 12, 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*

# ROSEN | HAGOOD

Alice F. Paylor  
apaylor@rrhlawfirm.com

December 12, 2016

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SC Court of Appeals

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

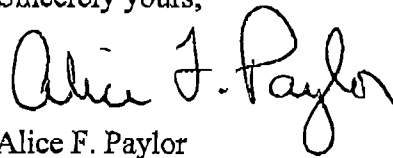
Re: *241-243 E. Bay Holdings, LLC v. City of Charleston, et al.*  
*2 Anson Street / 40-46 Market Street*  
*Appellate Case. No. 2016-002001*

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)

✓