

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

RECEIVED

DEC 14 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.

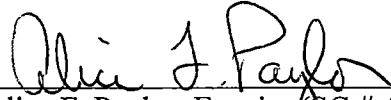
Re: 40-46 Market Street

**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,

A handwritten signature in cursive script, reading "Alice F. Paylor", written over a horizontal line.

Alice F. Paylor, Esquire (SC # 4380)
Rosen, Rosen & Hagood, LLC
151 Meeting Street, Suite 400
Charleston, SC 29401
Telephone: (843)577-6726
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Attorney for Appellant

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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:

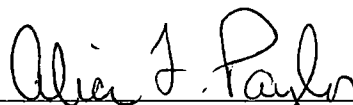
Timothy Domin
Clawson & Staubes, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492-8144
(843)577-2026

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

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Attorney for Respondent Rainbow Market Group, LLC

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Charleston, South Carolina
December 12, 2016

ROSEN | HAGOOD

Alice F. Paylor
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December 12, 2016

DEC 14 2016

SC Court of Appeals

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

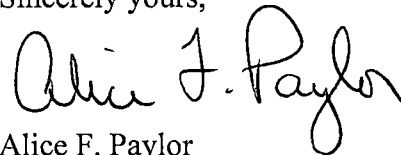
Re: *241-243 E. Bay Holdings, LLC v. City of Charleston, et al.*
2 Anson Street / 40-46 Market Street
Appellate Case. No. 2016-002001

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.

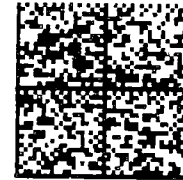
Sincerely yours,



Alice F. Paylor

RSD/dlw
Enclosure

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



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SC Court of Appeals

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

