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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Tanya A. Gee, Circuit Court Judge

Appellate Case No. 2015-002532
Case No. 2015-CP-40-03357

RECEIVED
JAN 12 2017
SC Court of Appeals

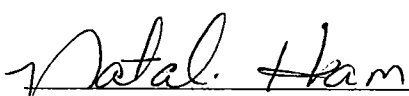
Christ Central Ministries.....Respondent,

v.

City of Columbia Board of Zoning Appeals.....Appellant.

**APPELLANT'S MOTION TO FILE MEMORANDUM IN OPPOSITION TO
RESPONDENT'S MOTION TO DISMISS OUT OF TIME**

The Appellant's response to Respondent's Motion to Dismiss was due on or before December 19th, 2016. Appellant was under the mistaken belief that it had thirty (30) days to respond. Appellant's attorney recently returned from maternity leave, misread the rules and begs the court's indulgence. Appellant, by and through its attorney, hereby requests leave of the Court to file its Memorandum out of time. Appellant believes the delay to be minimal in impact to the proceedings as the Court has not yet set this matter for a hearing and Respondent has not suffered any prejudice by the brief delay.



Natalie Armstrong Ham
Office of the City Attorney
Post Office Box 667
Columbia, South Carolina 29202
(803) 737-4242
Attorney for Appellant

January 12, 2017

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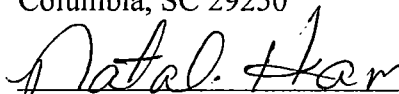
City of Columbia Board of Zoning Appeals.....Appellant.

PROOF OF SERVICE

I certify that I have served Appellant's Motion to File Memorandum in Opposition to Respondent's Motion to Dismiss Out of Time upon the attorneys below by depositing copies of it in the United States Mail, first class postage prepaid to them to their offices as indicated below on this on January 12, 2017.

Jay Bender, Esquire
Baker Ravenel & Bender, LLP
PO Box 8057
Columbia, SC 29202

J. Derrick Jackson, Esquire
Tobias G. Ward, Jr., PA
Post Office Box 50124
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January 12, 2017



We Are Columbia

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January 12, 2017

VIA HAND DELIVERY

The Hon. Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

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SC Court of Appeals

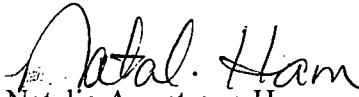
RE: Christ Central Ministries v. City of Columbia Board of Zoning Appeals
Civil Action No. 2015-CP-40-03357
Court of Appeals Reference No. 2015-002532

Dear Ms. Kitchings:

The *Appellant's Memorandum in Opposition to Respondent's Motion to Dismiss* in the above-referenced case was due to be served and filed by December 19, 2016. However, Appellant was under the mistaken belief that it had thirty (days) to respond to Respondent's Motion. By this letter and the enclosed motion, I respectfully request to be allowed to file Appellant's Memorandum in Opposition to Respondent's Motion to Dismiss after the original due date. I have enclosed the original and nine (9) copies along with the filing fee check of Twenty-five (\$25.00) Dollars for the filing of same.

I appreciate your consideration of this request. Please call me if you have any questions concerning this correspondence or any other matter.

Sincerely,


Natalie Armstrong Ham
Assistant City Attorney

NAH/jlh
Enclosure(s) as Stated

cc: Jay Bender, Esquire
J. Derrick Jackson, Esquire