

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

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Case No. 2016-CP-40-3102

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**RECEIVED**  
JAN 10 2017  
SC Court of Appeals

Richland County, South Carolina ..... Appellant/Respondent,

Central Midlands Regional Transit Authority, ..... Intervenor/Respondent,

v.

The South Carolina Department of Revenue,  
Rick Reames, III, in his official capacity as its Director, ..... Respondents/Appellants,

v.

Richland PDT, a joint venture consisting of  
M.B. Kahn Construction Co. Inc., ICA Engineering,  
Inc., and Brownstone Construction Group, LLC, as a  
unit and Individually ..... Third-Party Defendants.

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**MOTION FOR EXTENSION**

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Pursuant to Rule 240, SCACR, Respondents/Appellants request a 30-day extension of the deadline for filing their initial brief of appellants and designation of matter to be included in the record on appeal. The current deadline is January 20, 2017.

Respondents/Appellants counsel posits the following extraordinary circumstances supporting this request:

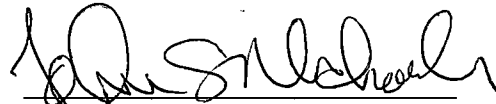
A. Petitioner's counsel has been dealing with an ongoing family illness out of town

which has taken an unexpected amount of time.

- B. Petitioner's counsel serves as special counsel to the South Carolina House and Senate Ethics Committees and both committees have held unscheduled and unexpected meetings during January 2017.

January 11, 2017

Respectfully submitted, r



John S. Nichols, No. 4210

Bluestein Nichols

Thompson & Delgado, LLC

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Columbia, South Carolina 29202

(803) 779-7599

Attorney for Respondents/Appellants

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on the date indicated below she served  
counsel with a copy of the *Motion for Extension* by mailing copies of the same by United  
States Mail with first class postage prepaid to the following addresses:

Andrew F. Lindemann  
Davidson & Lindemann, PA  
PO Box 8568  
Columbia, SC 29202-8568

**RECEIVED**

JAN 19 2017

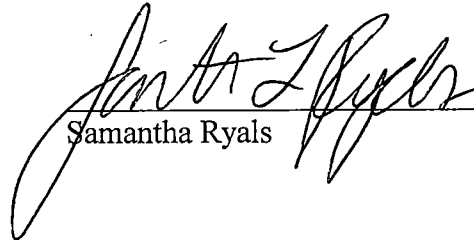
**SC Court of Appeals**

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January 19, 2017

  
Samantha Ryals



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

2229

January 19, 2017

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JAN 19 2017  
SC Court of Appeals

**VIA HAND DELIVERY**

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

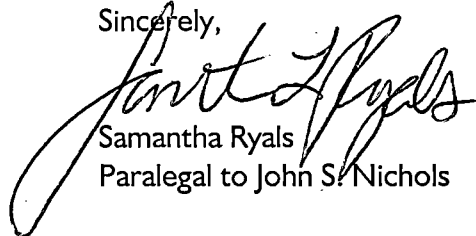
Re: Richland County v. SC Dept. of Revenue  
Case Tracking No. 2016-001839

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to the above matter. I have enclosed a proof of service of this document on counsel of record and a \$25.00 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Samantha Ryals  
Paralegal to John S. Nichols

/slr

Enclosures

cc: James E. Smith, Jr.  
Milton G. Kimpson  
Andrew F. Lindemann  
Benjamin E. Nicholson, V  
Ray N. Stevens  
Robert E. Tyson, Jr.