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THE STATE OF SOUTH CAROLINA  
South Carolina Court of Appeals

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JUN 27 2017

SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Honorable Marvin H. Dukes, III

Appellate Case No.: 2017-000620

BURTON FIRE DISTRICT

Respondent,

vs.

CITY OF BEAUFORT

Appellant.

And

BURTON FIRE DISTRICT

Respondent,

vs.

TOWN OF PORT ROYAL

Appellant.

MOTION FOR EXTENSION OF TIME TO FILE  
RESPONDENT'S INITIAL BRIEF AND DESIGNATION  
OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

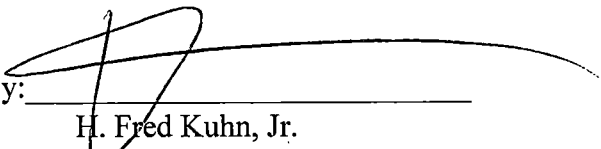
The Respondent would respectfully request an extension of time within which to file the Initial Brief of the Respondent and the Respondent's Designation of Matter to be Included in the Record on Appeal. These matters were due to be filed no later than June 26, 2017. The Respondent would respectfully request a thirty (30) day extension of time in which to file the same.

This motion is made upon the ground that an extension as requested would be in the best interest of justice, and would not prejudice the Appellant.

It is accordingly respectfully requested that the Respondent be granted until July 26, 2017 to file the Respondent's Initial Brief and the Respondent's Designation of Matter to be Included in the Record on Appeal.

MOSS, KUHN & FLEMING, P.A.

By: \_\_\_\_\_

  
H. Fred Kuhn, Jr.  
1501 North Street  
Post Office Drawer 507  
Beaufort, South Carolina 29901  
(843)524-3373  
(843)524-1302- FX

Beaufort, South Carolina  
June 23, 2017

Attorneys for Respondent

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CERTIFICATE OF SERVICE

JUN 27 2017

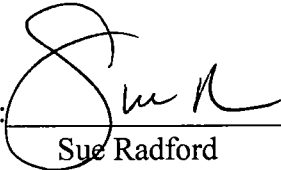
SC Court of Appeals

Undersigned certifies that the Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in Record on Appeal, to which this certificate is affixed, was served upon the party (s) to this action by hand delivery, certified mail or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

Mary Bass Lohr, Esquire  
Howell, Gibson & Hughes, P.A.  
Post Office Box 40  
Beaufort, South Carolina 29901

in a post office or official depository under the exclusive care and custody of the United States Postal Service, on June 23, 2017.

MOSS, KUHN & FLEMING, P.A.

By:   
Sue Radford

LAW OFFICES

MOSS, KUHN & FLEMING P.A.

JAMES H. MOSS  
H. FRED KUHN, JR.  
CORY H. FLEMING\*

1501 North Street P.O. Drawer 507~Beaufort, South Carolina 29901-0507  
TELEPHONE 843-524-3373  
FAX 843-524-1302

\*ALSO MEMBER OF GA BAR

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JUN 27 2017

SC Court of Appeals

June 23, 2017

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

RE: Burton Fire District v. City of Beaufort and Town of Port Royal  
Appellate Case No.: 2017-000620

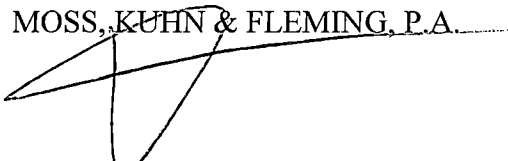
Dear Mrs. Kitchings:

Enclosed please find the original and seven (7) copies of the Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in Record on Appeal regarding the above-referenced matter along with my firms check in the amount of \$25.00 for the filing of the same. I would appreciate your returning one (1) filed copy to me in the enclosed self-addressed stamped envelope. By copy of this letter I am serving a copy of this motion on Mary Bass Lohr, Esquire.

With kindest regards, I am

Very truly yours,

MOSS, KUHN & FLEMING, P.A.



H. Fred Kuhn, Jr.  
HFKjr:sr  
Enclosures

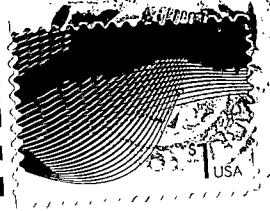
cc: Mary Bass Lohr, Esquire (w/enclosure)

MOSS, KUHNS & FLEMING, P.A.

1501 North Street

P.O. Drawer 507

Beaufort, SC 29901-0507



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SC Court of Appeals

Honorable Jenny Abbott Kitchings

Clerk, South Carolina Court of Appeals

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