

THE STATE OF SOUTH CAROLINA
South Carolina 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
REPLY TO RESPONDENT'S INITIAL BRIEF

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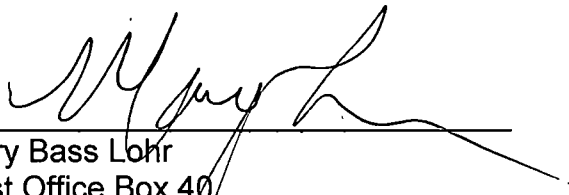
SC Court of Appeals

The Appellants, City of Beaufort and Town of Port Royal, respectfully request an extension of time to file a Reply to Respondent's Initial Brief. The Reply Brief is currently due on September 8, 2017, and the Appellants would respectfully request a thirty (30) day extension due to hurricane preparations and a possible mandatory evacuation. At this time, Beaufort County is expected to be



evacuated for at least one week. The undersigned counsel has had to reschedule appointments and court dates due to possible evacuation and would request additional time to file a Reply Brief. If the motion is granted, the Reply to Respondent's Initial Brief would be due thirty (30) days from the original due date, which would be October 8, 2017.

HOWELL, GIBSON & HUGHES, P.A.

By: 
Mary Bass Lohr
Post Office Box 40
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(843) 522-2400
Attorney for Appellants

Beaufort, South Carolina

September 7, 2017

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South Carolina Court of Appeals

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The undersigned counsel hereby certifies that she has served the foregoing Motion for Extension of Time to File Reply to Respondent's Initial Brief upon all counsel of record by affixing same with proper postage and placing same with the United States Postal Service on 7 day of September, 2017 addressed to the following:

H. Fred Kuhn, Jr., Esquire
Moss, Kuhn & Fleming, P.A.
Post Office Drawer 507
Beaufort, SC 29901-0507

HOWELL, GIBSON & HUGHES, P.A.

By: 

Mary Bass Lohr
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Attorney for Appellants

Beaufort, South Carolina

September 7, 2017

HOWELL, GIBSON AND HUGHES, P.A.
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September 7, 2017

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

Re: Burton Fire District vs. Town of Port Royal and City of Beaufort
Civil Action No.: Appellate Case No.: 2017-000620
Our File No: 11279 MBL

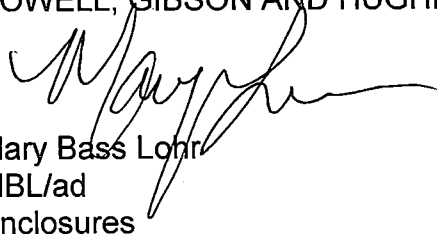
Dear Ms. Kitchings:

Please find enclosed herewith for filing an original and six (6) copies of a Motion for Extension of Time to File Reply to Respondent's Initial Brief along with the Proof of Service with regard to the above referenced matter. I would appreciate your filing the same and returning a filed clocked copy to me in the enclosed self-addressed, stamped envelope provided for your convenience.

With kindest regards, I am

Yours truly,

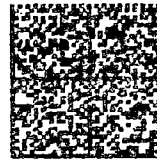
HOWELL, GIBSON AND HUGHES, P.A.



Mary Bass Lohr
MBL/ad
Enclosures

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SC Court of Appeals

cc: H. Fred Kuhn, Jr.

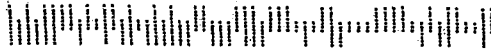


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TO:

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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Columbia, SC 29211
