

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge
Case No. 2013-CP-07-01341

RECEIVED
OCT 31 2017
SC Court of Appeals

Appeal Case No. 2017-001736

Road, LLC and Pinkney Point, LLC,..... Appellants,

v.

Beaufort County, a political subdivision of the
State of South Carolina,Respondent.

**MOTION FOR SECOND EXTENSION OF TIME TO FILE
INITIAL BRIEF AND DESIGNATION OF MATTER**

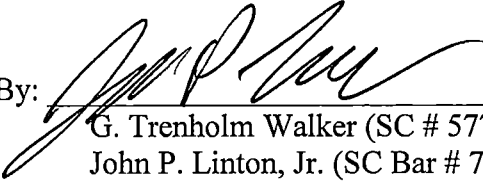
Appellant, Road, LLC, respectfully requests a 30-day extension of the deadline for filing and serving the initial brief and designation of matter to be included in the record on appeal in this case. The current deadline is November 3, 2017.

This extension is requested due to Appellant counsels' work load. Counsel is involved in several other heavily contested matters that have required significant time commitments. This is the second request for an extension of this deadline. Counsel for the Respondents have consented to this Motion.

This Motion is made in good faith and not for the purpose of delay.

Respectfully submitted,

✓

By: 
G. Trenholm Walker (SC # 5777)
John P. Linton, Jr. (SC Bar # 79130)
Walker Gressette Freeman & Linton, LLC
P.O. Box 22167
Charleston, SC 29413
(843) 727-2200
Attorneys for Appellant Road, LLC

October 30, 2017
Charleston, South Carolina

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Road, LLC and Pinkney Point, LLC, of which Road, LLC, is Appellant,

v.

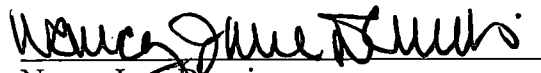
Beaufort County, a political subdivision of the State of South Carolina, Respondent.

PROOF OF SERVICE

I certify that I have served the **MOTION FOR SECOND EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**, on Respondent by depositing a copy of it in the United States Mail, postage prepaid, on October 30, 2017, addressed to its attorneys of record as follows:

C. Mitchell Brown
Nelson Mullins Riley & Scarborough, LLP
P.O. Box 11070
Columbia, SC 29211

Robert W. Achurch, III
Mary Bass Lohr
Howell Gibson & Hughes, P.A.
P.O. Box 40
Beaufort, SC, 29901



Nancy Jane Dennis
Paralegal

JOHN P. LINTON, JR.
Direct: 843.727.2252
Email: Linton@WGFLAW.com

October 30, 2017

Hon. Jenny Abbott Kitchings
Clerk of Court
The South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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OCT 31 2017
SC Court of Appeals

RE: **Road, LLC and Pinkney Point, LLC v. Beaufort County, a political subdivision of the State of South Carolina**
Appellate Case No. 2017-001736
WGFL File No.: 7087.001

Dear Ms. Kitchings:

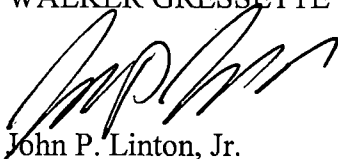
Enclosed please find the original and six copies of Appellant's Motion for Second Extension of Time to request an additional thirty (30) days for the service and filing of our initial brief and designation of matter. They are currently due on Friday November 3. With the extension, the due date would be Monday, December 4, 2017.

I have discussed the extension with opposing counsel who has no objection.

I have enclosed our firm's check for \$25. With kind regards, I am,

Sincerely,

WALKER GRESSETTE FREEMAN & LINTON, LLC



John P. Linton, Jr.

Enclosure (Motion and Check)

c: C. Mitchell Brown, Esq.
Robert W. Achurch, III, Esq.
Mary Bass Lohr, Esq.



Package
US Airbill

FedEx
Tracking
Number

8120 5633 5538

Form
ID No.

0215

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From: [Redacted]
Date: 10/5/17

Sender's Name: J. Linton
Phone: [Redacted]

Company: WALKER GRESSETTE FREEMAN & LIN
OCT 31 2017

Address: 66 HASELL ST
SC Court of Appeals

City: CHARLESTON State: SC ZIP: 29401-1616

Your Internal Billing Reference: 7027 001

To Recipient's Name: Janny Abbott
Phone: [Redacted]

Company: SC Court of Appeals

Address: 1200 Park St
We cannot deliver to P.O. boxes or P.O. ZIP codes.
Dept./Floor/Suite/Room: [Redacted]

Address: [Redacted]
Use this line for the HOLD location address or for continuation of your shipping address.

City: Columbia State: SC ZIP: 29201

0128180776



8120 5633 5538

4 Express Package Service *To most locations.

Packages up to 150 lbs.
For packages over 150 lbs., use the
FedEx Express Freight US Airbill.

Next Business Day

FedEx First Overnight
Earliest next business morning delivery to select locations. FedEx shipments will be delivered on Monday unless Saturday Delivery is selected.

FedEx Priority Overnight
Next business morning.* Friday shipments will be delivered on Monday unless Saturday Delivery is selected.

FedEx Standard Overnight
Next business afternoon.* Saturday Delivery NOT available.

2 or 3 Business Days

FedEx 2Day A.M.
Second business morning.* Saturday Delivery NOT available.

FedEx 2Day
Second business afternoon.* Thursday shipments will be delivered on Monday unless Saturday Delivery is selected.

FedEx Express Saver
Third business day.* Saturday Delivery NOT available.

5 Packaging *Declared value limit \$500.

FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options Fees may apply. See the FedEx Service Guide.

Saturday Delivery
NOT available for FedEx Standard Overnight, FedEx 2Day A.M., or FedEx Express Saver.

No Signature Required
Package may be left without obtaining a signature for delivery.

Direct Signature
Someone at recipient's address may sign for delivery.

Indirect Signature
If no one is available at recipient's address, someone at a neighboring address may sign for delivery. For residential deliveries only.

Does this shipment contain dangerous goods?

One box must be checked.
 No Yes As per attached Shipper's Declaration. Yes Shipper's Declaration not required. Dry Ice Dry Ice, 9 UN 1845 x _____ kg

Restrictions apply for dangerous goods—see the current FedEx Service Guide. Cargo Aircraft Only

7 Payment Bill to:

Enter FedEx Acct. No. or Credit Card No. below. Obtain recip. Acct. No.
 Sender Acct. No. In Section 1 will be billed. Recipient Third Party Credit Card Cash/Check

Total Packages: [Redacted] Total Weight: [Redacted] lbs.
Credit Card Auth. [Redacted]

*Our liability is limited to US\$100 unless you declare a higher value. See the current FedEx Service Guide for details.

