

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  
\_\_\_\_\_

\_\_\_\_\_  
Appeal Case No. 2017-001736  
\_\_\_\_\_

**RECEIVED**  
MAR 15 2018  
SC Court of Appeals

Road, LLC and Pinkney Point, LLC, Plaintiffs,  
Of whom Road, LLC is the.....Appellant.

v.

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

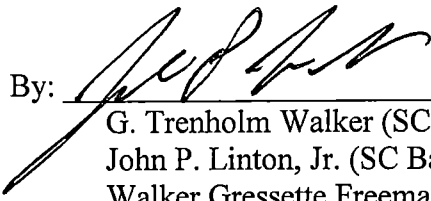
\_\_\_\_\_  
**MOTION FOR SECOND EXTENSION OF TIME TO FILE  
INITIAL REPLY BRIEF**  
\_\_\_\_\_

Appellant, Road, LLC, respectfully requests a 10-day extension of the deadline for filing and serving the initial reply brief in this case. The current deadline is March 19, 2018. The requested deadline is March 29, 2018.

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*

March 13, 2018  
Charleston, South Carolina

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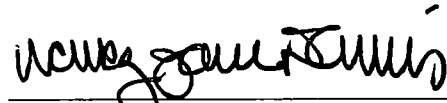
Beaufort County, a political subdivision of the  
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\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

I certify that I have served the **MOTION FOR SECOND EXTENSION OF TIME TO FILE INITIAL REPLY BRIEF**, on Respondent by depositing a copy of it in the United States Mail, postage prepaid, on March 13, 2018, 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](mailto:Linton@WGFLAW.com)

March 13, 2018

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

**RECEIVED**  
MAR 15 2018  
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 ten (10) days for the service and filing of our initial reply brief. It currently due on Monday, March 19. With the extension, the due date would be Wednesday, March 29, 2018.

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.

**W** WALKER  
GRESSETTE  
FREEMAN  
LINTON LLC

66 Hasell Street, Charleston, SC 29401  
PO Box 22167, Charleston, SC 29413



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