

80454

**STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS**

RECEIVED

APR 16 2018

SC Court of Appeals

Appeal from the Court of Common Pleas
For Charleston County
Honorable Kristi L. Harrington, Circuit Court Judge
Civil Action No.: 2016-CP-10-5578
Appellate Case No.: 000511

TOWN OF SULLIVAN'S ISLAND,

Respondent,

v.

MICHAEL MURRAY,

Appellant.

**APPELLANT'S MOTION FOR EXTENSION
OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Stephen P. Groves, Sr., Esquire
S.C. Bar. No.: 007854
Mary D. Shahid, Esquire
S.C. Bar No.: 001794
205 King Street, Suite 400
Charleston, South Carolina 29401
Telephone: 843.720.1725
Telecopier: 843.414.8206
E-Mail: SGroves@nexsenpruet.com

*Attorneys for the Appellant,
Michael Murray*

✓

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

COMES NOW the Appellant, Michael Murray ("Mr. Murray"), pursuant to Rule 240 of the South Carolina Appellate Court Rules, and respectfully requests this Court of Appeals to grant him a thirty-day extension of time in which to file Mr. Murray's *Initial Brief of the Appellant* and the *Designation of the Matters to be Included in the Record on Appeal*.

The basis for this motion is Mr. Murray's appellate counsel are presently involved in other appellate and trial matters and they need additional time in which to complete the Initial Appellant's Brief and the DOM. Based upon the current briefing schedule Mr. Murray's Initial Appellant's Brief and DOM are currently due on or before Friday, 20 April 2018. Consequently, anticipating a subsequent grant of this request, Mr. Murray's Initial Appellant's Brief and DOM would then be due on Monday, 21 May 2018 (30th day falls on Sunday, 20 May 2018). Mr. Murray respectfully requests this Court of Appeals hold the briefing time in abeyance until such time as this motion may be ruled upon.

Respectfully submitted:

NEXSEN PRUET, LLC

By:

Stephen P. Groves, Sr., Esquire (S.C. Bar. No. 007854)
Mary D. Shahid, Esquire (S.C. Bar No. 001794)
205 King Street, Suite 400
Charleston, South Carolina 29401
Telephone: 843.720.1725 Telecopier: 843.414.8206
E-Mail: SGroves@nexsenpruet.com

Attorneys for the Appellant, Michael Murray

Charleston, South Carolina

13 April 2018

NPCHAR1:2406086.1-TBF-(SPG) 059803-00001

**STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS**

Appeal from the Court of Common Pleas
For Charleston County
Honorable Kristi L. Harrington, Circuit Court Judge
Civil Action No.: 2016-CP-10-5578
Appellate Case No.: 000511

RECEIVED

APR 16 2018

SC Court of Appeals

TOWN OF SULLIVAN'S ISLAND,

Respondent,

v.

MICHAEL MURRAY,

Appellant.

**PROOF OF SERVICE FOR THE APPELLANT'S
MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF AND DESIGNATION OF MATTER**

Stephen P. Groves, Sr., Esquire
S.C. Bar. No.: 007854
Mary D. Shahid, Esquire
S.C. Bar No.: 001794
NEXSEN PRUET, LLC
205 King Street, Suite 400
Charleston, South Carolina 29401
Telephone: 843.720.1725
Telecopier: 843.414.8206
E-Mail: SGroves@nexsenpruet.com

*Attorneys for the Appellant,
Michael Murray*

I, Stephen P. Groves, Sr., Esquire, hereby certify that on 13 April 2018, I served a copy of the **Motion for Extension of Time to File Initial Appellant's Brief and Designation of Matter** submitted by the Appellant, Michael Murray, on counsel for the Respondent via the United States Mail, postage pre-paid, and addressed as follows:

John J. Dodds, III, Esquire
CISA & DODDS, LLP
858 W Lowcountry Boulevard
Unit No. 101
Mt. Pleasant, South Carolina 29464
Telephone: 843.881.6530
E-Mail: jdodds@cisadodds.com

Attorneys for the Respondent

Signed: _____

Stephen P. Groves, Sr.

Charleston, South Carolina

13 April 2018

NPCHAR1:2406086.1-TBF-(SPG) 059803-00001

Stephen P. Groves, Sr.
Member
Admitted in SC

13 April 2018

VIA U.S. REGUALR MAIL

RECEIVED
APR 16 2018
SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
SOUTH CAROLINA COURT OF APPEALS
1220 Senate Street
Columbia, South Carolina 29201

Re: **Michael Murray v. Town of Sullivan's Island**
Appeal from the Charleston County Court of Common Pleas
Case Action No.: 2016-CP-10-5578
Appellate Case Tracking No.: **2018-000511**
NP File No.: 059803-00001

Dear Ms. Kitchings:

- Charleston
- Charlotte
- Columbia
- Greensboro
- Greenville
- Hilton Head
- Myrtle Beach
- Raleigh

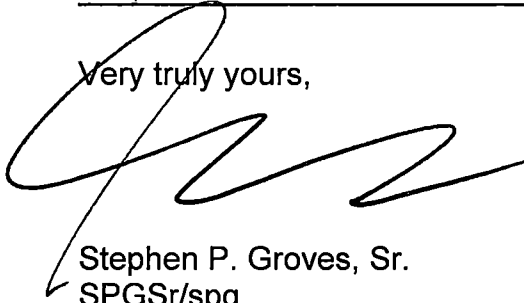
Pursuant to Rule 240, SCACR, please find enclosed the original and seven copies of a **Motion for Extension of Time in Which to File Initial Appellant's Brief and DOM** in the above-referenced appellate matter. I also enclose a **Proof of Service** indicating service of the **Motion for Extension of Time in Which to File Initial Appellant's Brief and DOM** and the **Proof of Service** upon counsel for the Respondent, Town of Sullivan's Island. Finally, I enclose our firm check in the amount of \$25.00 as payment for the filing fee.

I would greatly appreciate you filing the **Motion for Extension of Time in Which to File Initial Appellant's Brief and DOM** and the **Proof of Service** with the Court of Appeals and returning a date stamped copy of each to my attention in the enclosed self-addresses, stamped envelope.

If you need anything else or I otherwise may be of any assistance to you or to the Court of Appeals regarding this matter or any other, please feel free to contact me at your convenience. My direct telephone number is 843.720.1725, direct telecopier is 843.414.8206, and the e-mail is sgroves@nexsenpruet.com.

**Honorable Jenny Abbott Kitchings
Clerk of Court
13 April 2018
Page 2 of 2**

Very truly yours,

A handwritten signature in black ink, appearing to read "Stephen P. Groves, Sr.", written over a horizontal line.

**Stephen P. Groves, Sr.
SPGSr/spg
Enclosures**

**cc: John J. Dodds, III, Esquire
NPCHAR1:2406116.1-LT-(SPG) 059803-00001**

Haster
04/13/2018
US POSTAGE \$002.26

345 25101
01216718

NEXSEN | PRUET

P. O. Box 486
Charleston SC 29402

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

RECEIVED
APR 16 2018
SC Court of Appeals

59803-1 spg