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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKLEY COUNTY
Court of Common Pleas

Dale E. Van Slambrook, Circuit Court Judge

RECEIVED
MAY 21 2018
SC Court of Appeals

Case No.: 2016-CP-08-01261
Appellate Case No.: 2017-000796

Benjamin Reyna, d/b/a, El Alamo Restaurant,.....Appellant,

vs.

The Town of Hanahan, Respondent.

MOTION FOR THIRTY DAY EXTENSION

Pursuant to Rule 240, *South Carolina Appellate Court Rules*, the appellant, Benjamin Reyna, d/b/a, El Alamo Restaurant, requests the Court to grant the appellant an additional thirty (30) days to file his initial brief. This request is based on the appellant's lawyer's workload, including a deadline for three separate cases pending in the Court of Appeals within two (2) days of one another on May 22nd and 23rd. This is appellant's second request, and, if granted, makes the initial brief due on or before Thursday, June 21, 2018.

Respectfully submitted,

May 18, 2018



BELK, COBB, INFINGER & GOLDSTEIN, P.A.
Thomas R. Goldstein, S. C. Bar #2186
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tgoldstein@cobblaw.net
Attorneys for Appellants

CERTIFICATE OF COUNSEL

I certify that prior to filing this request for extension, I consulted with opposing counsel who does not oppose the request.



May 18, 2018

Thomas R. Goldstein, S. C. Bar #2186

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PROOF OF SERVICE

I certify that I have served the Appellant's Request for Extension on the Respondent, The Town of Hanahan, by depositing a copy of it in the United States Mail, postage prepaid, on May 18, 2017, addressed to its attorney of record, Stafford John McQuillin, III, P. O. Box 340, Charleston, S. C. 29402.

May 18, 2018



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May 18, 2018

Hon. Jenny A. Kitchings,
Clerk of Court
ATTN.: AMELIA
S. C. Court of Appeals
P. O. Box 11629
Columbia, S. C. 29211

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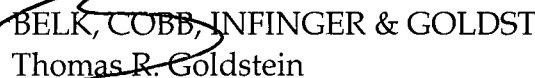
Re: Benjamin Reyna vs. Town of Hanahan; Case No.: 2016-CP-08-1261
Appellate Tracking Number: 2017-000796

Dear Ms. Kitchings,

I enclose an original and seven copies of my request for extension along with a proof of service. Would you be so kind as to file the motion and return an extra copy to me in the self, addressed, return envelope? By copy of this letter, I am providing a copy to opposing counsel.

I thank you for your attention to this request. With kind regards, I am

Very truly yours,


BELK, COBB, INFINGER & GOLDSTEIN, P.A.
Thomas R. Goldstein

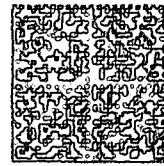
TRG/

enclosure: Motion for Extension, return envelope, check #18311

cc: (with enclosure)
Mac McQuillin, Esq.

✓

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Belk, Cobb, Infinger & Goldstein, PA
P. O. Box 71121
Charleston, S. C. 29415-1121

Hon. Jenny A. Kitchings,
Clerk of Court
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