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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger M. Young, Circuit Court Judge

Appellant Case No.: 2018-000907

241-243 E. Bay Holdings, LLC,Appellant,

v.

The City of Charleston, The City of Charleston Board of Zoning Appeals - Zoning,
Apex Real Property, LLC, and East Bay 7, LLC,.....Respondents.

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SC Court of Appeals

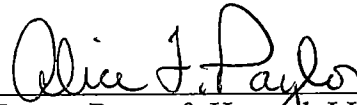
**APPELLANT'S MOTION TO EXTEND TIME
TO FILE APPELLANT'S INITIAL BRIEF**

Pursuant to the South Carolina Court of Appeals Rules, Appellant 241-243 E. Bay Holdings, LLC, by and through its undersigned counsel, hereby move the Court for an order granting Appellant a thirty (30) day extension of time, until July 11, 2018, in which to file and serve Appellant's Initial Brief. Appellant would submit that this extension is necessary due to counsel's travel schedule and current case load. This deadline has not previously been extended.

Undersigned counsel has contacted counsel for Respondent, and he has no objection to this request.

[SIGNATURE BLOCK ON NEXT PAGE]

June 4, 2018



Rosen, Rosen & Haggood, LLC

Alice F. Paylor SC Bar #4380

P.O. Box 893

Charleston, SC 29402

(843) 266-8105

Attorney for Appellant

Other Counsel of Record:

Daniel S. McQueeney, Jr., Esquire

50 Broad Street

Charleston, SC 29401

ATTORNEYS FOR RESPONDENT THE CITY OF
CHARLESTON AND THE CITY OF CHARLESTON
BOARD OF ZONING APPEALS-ZONING

Charles J Baker, III, Esq.

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5 Exchange St. (29401)

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ATTORNEYS FOR APEX REAL PROPERTY, LLC
N/K/A PEARCE DEVELOPMENT, LLC

THE STATE OF SOUTH CAROLINA
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Appellate Case No.: 2018-000907

241-243 E. Bay Holdings, LLC,Appellant,

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PROOF OF SERVICE

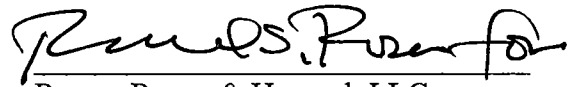
I certify that I have served Appellant's Motion to Extend Time to File Appellant's Initial Brief on Respondents The City of Charleston, The City of Charleston Board of Zoning Appeals – Zoning and Apex Real Property, LLC by depositing a copy of it in the United States Mail, postage prepaid on June 4, 2018, addressed to attorneys of record as follows:

Daniel S. McQueeney, Jr., Esquire
50 Broad Street
Charleston, SC 29401

Charles J Baker, III, Esq.
Womble Carlyle Sandridge & Rice, LLP
5 Exchange St. (29401)
P.O. Box 999
Charleston, SC 29402

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June 4, 2018

A handwritten signature in black ink, appearing to read "Paul S. Rosen". The signature is written in a cursive style with a horizontal line underneath it.

Rosen, Rosen & Hagood, LLC
Alice F. Paylor, SC Bar #4380
P.O. Box 893
Charleston, SC 29402
(843) 266-8105
Attorney for Appellant

ROSEN | HAGOOD

Cynthia H. Gourdine
cgourdine@rrhlawfirm.com

June 4, 2018

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: 241-243 E. Bay Holdings, LLC v. The City of Charleston, et al.
Appellate Case No.: 2018-000907

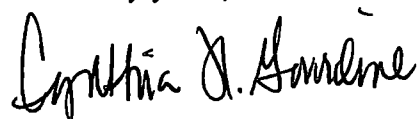
Dear Mrs. Kitchings:

Enclosed please find the original and six copies of Appellant 241-243 E. Bay Holdings, LLC's Motion for Extension of Time to File Appellant's Initial Brief in the above-referenced matter, along with our Proof of Service. We would appreciate it if you would please file the originals and return a clocked-in copy to us in the enclosed self-addressed, stamped envelope.

Also enclosed is our firm's check in the amount of \$25.00 to cover the costs associated with filing the Motion.

Thank you in advance for your assistance in this matter. Should you have any questions or comments, please do not hesitate to contact us.

Sincerely yours,



Cynthia H. Gourdine

/chg

Enclosures

cc: Daniel S. McQueeney, Jr., Esquire (w/ enc.)
Charles J. Baker, III, Esquire (w/ enc.)





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P.O. Box 893
Charleston, SC 29402

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
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