

87026

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.

APPELLANT'S MOTION FOR EXTENSION OF TIME
TO ORDER TRANSCRIPT

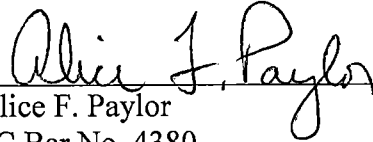
RECEIVED
JUN 15 2018
SC Court of Appeals

Appellant 241-243 E. Bay Holdings, LLC, by and through its undersigned counsel, hereby moves the Court for permission to order the transcript of the oral arguments made to the Court below outside the filing deadlines set by Rule 207 of the South Carolina Appellant Court Rules. Counsel was out of the country between May 15 and May 30, 2018 and did not realize that the transcript had not been ordered until she returned. A copy of Appellant's emails and letter to the Court Reporter ordering a copy of the transcripts of these proceedings is attached hereto.

[SIGNATURE BLOCK ON NEXT PAGE]

Respectfully submitted,

ROSEN, ROSEN & HAGOOD, LLC

A handwritten signature in cursive script that reads "Alice F. Paylor". The signature is written over a solid horizontal line.

Alice F. Paylor
SC Bar No. 4380
P.O. Box 893
Charleston, SC 29402
(843) 266-8105
Attorney for Appellant

June 13, 2018

Cynthia Gourdine

From: Cynthia Gourdine
Sent: Friday, June 8, 2018 1:02 PM
To: 'kandersen@sccourts.org'
Cc: 'transcripts@sccourts.org'
Subject: REQUEST FOR HEARING TRANSCRIPT

REQUEST FOR HEARING TRANSCRIPT

Case Name: 241-243 E. Bay Holdings, LLC v. City of Charleston, et al.
C/A # 2017-CP-10-4212
County: Charleston
Date/Time: April 16, 2018 @ 2:30 p.m.
Judge: The Honorable Roger Young

Good Afternoon,

This email is our formal request to receive an expedited copy of the April 16, 2018 hearing transcript concerning the above-referenced matter.

Thank you for your assistance and should you have any questions or comments, please do not hesitate to contact me.

Kind regards,

Cynthia Gourdine

*[Legal Assistant to Richard Rosen, Alice Paylor,
Elizabeth Palmer & Frank Blanchard]*

151 Meeting St., Suite 400
Charleston SC 29401
| office | 843-577-6726
| fax | 843-724-8036
| direct phone | (843) 266-8136
cgourdine@rrhlawfirm.com
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Cynthia Gourdine

From: Andersen, Karen <kandersen@sccourts.org>
Sent: Monday, June 11, 2018 12:05 PM
To: Cynthia Gourdine
Cc: transcripts
Subject: RE: REQUEST FOR HEARING TRANSCRIPT
Attachments: image001.gif

I received your request for the above expedited transcript. The hearing is 37 pages @ \$4.25 per page. Upon the payment to me of \$157.25 at the address below, I will email the transcript to you within 5 business days. For faster service, you can send payment through PayPal at kandersen3592@yahoo.com. Thank you.

Karen V. Andersen, RMR, CRR
2496 Kings Gate Lane
Mt. Pleasant, SC 29466

From: Cynthia Gourdine [cgourdine@rrhlawfirm.com]
Sent: Friday, June 8, 2018 1:01 PM
To: Andersen, Karen
Cc: transcripts
Subject: REQUEST FOR HEARING TRANSCRIPT

REQUEST FOR HEARING TRANSCRIPT

Case Name: 241-243 E. Bay Holdings, LLC v. City of Charleston, et al.
C/A # 2017-CP-10-4212
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Kind regards,

Cynthia Gourdine
|Legal Assistant to Richard Rosen, Alice Paylor,
Elizabeth Palmer & Frank Blanchard|
151 Meeting St., Suite 400
Charleston SC 29401
|office| 843-577-6726

|fax| 843-724-8036

|direct phone| (843) 266-8136

cgourdine@rrhlawfirm.com<<mailto:cgourdine@rrhlawfirm.com>>

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[JtsT3qmQpwTiWLWYIowG5xzJDDJ475aZPw&m=3uQ0DgoUTC7Nd_crS7CPcToycR0qOOJAyjUWFmPo](https://urldefense.proofpoint.com/v2/url?u=http-3A_www.rrhlawfirm.com_images_vcards_&d=DwMFAg&c=YGvVmrQQ6VQOFx3Z93C9uQ&r=xdqkisLB)
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[30Q&s=H7wtPOixxSpwtPIVwvdmXNZmyYRkMyxuU-gLzGeswzQ&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A_www.rrhlawfirm.com_images_vcards_&d=DwMFAg&c=YGvVmrQQ6VQOFx3Z93C9uQ&r=xdqkisLB)

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To: [cgourdine@rrhlawfirm.com](mailto:cgourdine@rrhlawfirm.com)

From:

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# ROSEN | HAGOOD

Cynthia H. Gourdine  
cgourdine@rrhlawfirm.com

June 12, 2018

Karen V. Andersen, RMR, CRR  
2496 Kings Gate Lane  
Mt. Pleasant, SC 29466

Re: Case Name: 241-243 E. Bay Holdings, LLC v. City of Charleston, et al.  
C/A #: 2017-CP-10-4212  
County: Charleston  
Date/Time: April 16, 2018 @ 2:30 p.m.  
Judge: The Honorable Roger Young

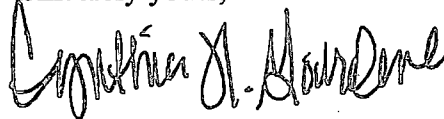
Dear Ms. Anderson:

Enclosed please find our firm's check in the amount of \$157.25 to cover your fee for receipt of an expedited copy of the hearing transcript concerning the above-referenced matter.

Should you have any questions or comments, please do not hesitate to contact me.

With kind regards, I am

Sincerely yours,



Cynthia H. Gourdine

/chg  
Enclosure

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Roger M. Young, Circuit Court Judge

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Case No. 17-CP-10-4212

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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.

---

**PROOF OF SERVICE**

---

I certify that I have served Appellant's Motion for Extension of Time to Order Transcript by depositing a copy of it in the United States Mail, postage prepaid on June 13, 2018, addressed to attorneys of record as follows:

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

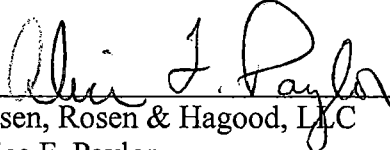
Charles J Baker, III, Esq.  
Womble Carlyle Sandridge & Rice, LLP  
5 Exchange St. (29401)  
P.O. Box 999  
Charleston, SC 29402

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JUN 15 2018

SC Court of Appeals

June 13, 2018

  
\_\_\_\_\_  
Rosen, Rosen & Hagood, LLC  
Alice F. Paylor  
SC Bar No.: 4380  
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Charleston, SC 29402  
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Attorney for Appellant

# ROSEN | HAGOOD

Cynthia H. Gourdine  
cgourdine@rrhlawfirm.com

June 13, 2018

RECEIVED  
JUN 15 2018  
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

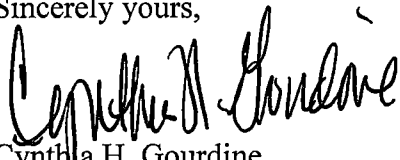
Dear Mrs. Kitchings:

Enclosed please find the original and six copies of Appellant 241-243 E. Bay Holdings, LLC's Motion for Extension of Time to Order Transcript 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.)

9629.000

**ROSEN | HAGOOD**

151 Meeting Street, Suite 400  
Charleston, South Carolina 29401

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

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JUN 15 2018  
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