

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Roger M. Young, Circuit Court Judge

RECEIVED

JUL 11 2018

SC Court of Appeals

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.

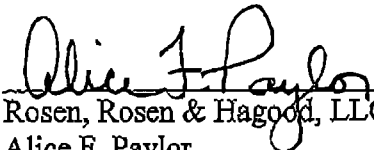
**APPELLANT'S MOTION TO EXTEND TIME  
TO FILE APPELLANT'S INITIAL BRIEF**

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 August 15, 2018, in which to file and serve Appellant's Initial Brief. Appellant would submit that this extension is necessary due to her husband's unexpected illness and recent surgery that required her to be out of the office for more than a week and could require that she miss further time. This deadline has not previously been extended.

Undersigned counsel has contacted counsel for Respondents Apex Real Property, LLC,

and East Bay 7, LLC, and he has no objection. Counsel for Respondents The City of Charleston and The City of Charleston Board of Zoning Appeals – Zoning was contacted but no response was received.

July 11, 2018

  
Rosen, Rosen & Hagood, LLC  
Alice F. Paylor  
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.  
Womble Carlyle Sandridge & Rice, LLP  
5 Exchange St. (29401)  
P.O. Box 999  
Charleston, SC 29402  
ATTORNEYS FOR APEX REAL PROPERTY, LLC  
N/K/A PEARCE DEVELOPMENT, LLC

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APPEAL FROM CHARLESTON COUNTY  
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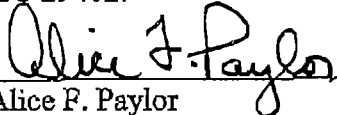
241-243 E. Bay Holdings, LLC .....Appellant

vs.

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 filed the **Appellant’s Motion to Extend Time to File Appellant’s Initial Brief** by faxing and mailing a copy of it to the Clerk’s office, in accordance with SCACR Rule 262(a)(2), and served it by emailing and depositing a copy in the United States Mail, postage prepaid, on July 11, 2018, addressed to all counsel of record, Daniel S. McQueeney, Jr., Esquire, 50 Broad Street, Charleston, SC 29401 and Charleston J. Baker, III, Esquire, 5 Exchange Street (29401), P.O. Box 999, Charleston, SC 29402.

  
\_\_\_\_\_  
Alice F. Paylor  
Rosen, Rosen & Hagood, LLC  
151 Meeting Street, Suite 400  
Charleston, SC 29401  
(843) 577-6726  
ATTORNEY FOR APPELLANT

July 11, 2018

ROSEN, ROSEN & HAGOOD, LLC - OPERATING ACCOUNT  
CHARLESTON, SC 29402

17132

DATE	DESCRIPTION	INVOICE #	CHECK		NET AMOUNT
			AMOUNT	DEDUCTION	
07/11/18	111.00 Clerk of South Carolina Court of Appeals Filing Fee (9629)		25.00		25.00

RECEIVED

JUL 11 2018

SC Court of Appeals

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ROSEN, ROSEN & HAGOOD, LLC  
ATTORNEYS AT LAW  
OPERATING ACCOUNT  
P.O. BOX 893  
CHARLESTON, SC 29402

**Pinnacle** 17132

87-63/640

DATE: 07/11/18 CHECK: 17132 AMOUNT: \*\*\*\*\*\$25.00

PAY TO THE ORDER OF: Clerk of South Carolina Court of Appeals  
P.O. Box 11629  
Columbia SC 29211

\*\*\* TWENTY-FIVE & 00/100 DOLLARS \*\*\*

AMOUNTS OVER \$100,000.00 REQUIRE 2 SIGNATURES  
VOID AFTER 180 DAYS

AUTHORIZED SIGNATURES

TRUE WATERMARK PAPER - HOLD TO LIGHT TO VIEW

HEAT SENSITIVE RED INK IN DISAPPEARS WITH HEAT

⑈017132⑈ ⑆064008637⑆ 2020005415⑈

JUL 11. 2018 3:07PM Rosen Hagood 843.724.8036

No. 0584 P. 6

Alice F. Paylor  
apaylor@rrhlawfirm.com  
(843) 266-8126

# ROSEN | HAGOOD

July 11, 2018

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SC Court of Appeals

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

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

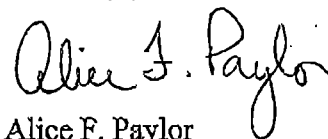
Dear Ms. Kitchings:

Enclosed please find an original and seven copies of the Appellant's Motion to Extend Time to File Appellant's Initial Brief and Proof of Service in the above referenced matter. I have included a self-addressed stamped envelope for your convenience in returning clocked copies to our office. I have also filed this motion via electronic facsimile pursuant to SCACR Rule 262(a)(2).

I appreciate your assistance in this matter.

With kind regards, I am

Sincerely yours,



Alice F. Paylor

AFP/amw  
Enclosures

cc: Daniel S. McQueeney, Jr., Esquire  
Charles J. Baker, III, Esquire

