

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 13 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
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P.O. Box 893
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(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

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

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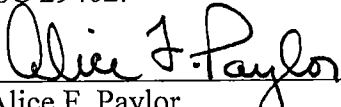
241-243 E. Bay Holdings, LLCAppellant

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.



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July 11, 2018

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ROSEN | HAGOOD

July 11, 2018

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

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

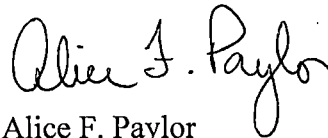
Dear Ms. Kitchings:

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,

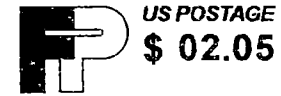
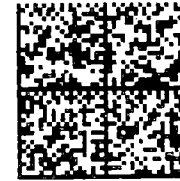

Alice F. Paylor

AFP/amw

Enclosures

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

✓



Mailed From 29401
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151 Meeting Street, Suite 400
Charleston, South Carolina 29401

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