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THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Honorable Benjamin H. Culbertson, Circuit Court Judge

RECEIVED

DEC 05 2018

SC Court of Appeals

Case No. 2016-CP-26-02377

Appellate Case No. 2018-001221

In Re: Venture Engineering, agent for DT LLC Respondent,

v.

Horry County Zoning Board of Appeals Appellant.

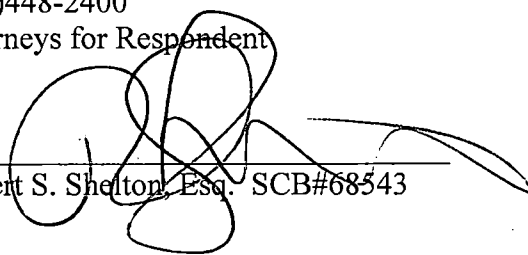
MOTION FOR EXTENSION TO FILE BRIEF OF RESPONDENT

Respondent hereby requests a thirty (30) day extension of time to file the Brief of Respondent for good cause shown. Opposing counsel does not oppose the motion.

The Brief of Respondent is due December 7, 2018 and if this request is granted, the Brief of Respondent will be due on January 7, 2019. Respondent submits that this Motion for Extension is not intended for purposes of delay.

Respectfully submitted,

BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.
P.O. Box 357
Myrtle Beach, SC 29578
(843)448-2400
Attorneys for Respondent



Robert S. Shelton, Esq. SCB#68543

Myrtle Beach, South Carolina
Dated: December 4, 2018

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In Re: Venture Engineering, agent for DT LLC*Respondent,*

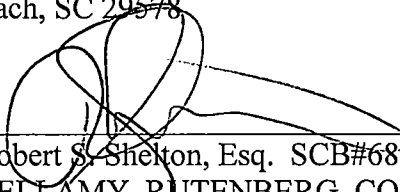
v.

Horry County Zoning Board of Appeals*Appellant.*

PROOF OF SERVICE

I certify that I have served the **Motion for Extension to File Brief of Respondent** in the above-captioned matter on the following individuals by depositing a copy in the United States Mail, with sufficient first-class postage affixed, addressed as follows:

Emma Ruth Brittain, Esq.
Matthew R. Magee, Esq.
Thomas & Brittain, P.A.
P.O. Box 1290
Myrtle Beach, SC 29578


Robert S. Shelton, Esq. SCB#68543
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P.O. Box 357
Myrtle Beach, SC 29578
(843)448-2400
Attorneys for Respondent

Myrtle Beach, South Carolina
Dated: December 4, 2018

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* LLM TAXATION
** LICENSED IN SC & NC
+ CERTIFIED MEDIATOR
** CERTIFIED ARBITRATOR



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JOHN E. COPELAND
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December 4, 2018

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SC Court of Appeals

VIA FEDERAL EXPRESS

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: In Re: Venture Engineering, agent for DT LLC v. Horry County Zoning Board of Appeals
Appellate Case No.: 2018-001221

Dear Ms. Kitchings:

Enclosed for filing is one (1) unbound original and seven (7) copies of Respondent's Motion for Extension to File Brief of Respondent and Proof of Service in the above referenced matter.

The filing fee in the amount of \$50.00 is enclosed. According to my calculations, should this Motion be granted, the Brief of Respondent will be due on or before January 7, 2019. Please let me know immediately if my calculations are incorrect.

I would appreciate you returning a clocked copy of the Motion and Proof of Service in the enclosed self-addressed, stamped envelope provided for your convenience. Please do not hesitate to contact me should you have any questions.

With kindest regards, I am

Yours very truly,
BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.

Robert S. Shelton

December 4, 2018

Page 2

RSS:nmr

Enclosure as noted

cc: Client

Emma Ruth Brittain, Esq.

Matthew R. Magee, Esq.

300

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4a Express Package Service

- FedEx Priority Overnight
Next business morning.* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx Standard Overnight
Next business afternoon.* Saturday Delivery NOT available.
- FedEx 2Day
Second business day.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected. FedEx Envelope rate not available. Minimum charge: One-pound rate.
- FedEx Express Saver
Third business day.* Saturday Delivery NOT available.

Packages up to 150 lbs.

FedEx First Overnight
Earliest next business morning* delivery to select locations.* Saturday Delivery NOT available.

* To most locations.

4b Express Freight Service

- FedEx 1Day Freight*
Next business day.** Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- FedEx 2Day Freight
Second business day.** Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.

Packages over 150 lbs.

FedEx 3Day Freight
Third business day.** Saturday Delivery NOT available.

** To most locations.

* Call for Confirmation:

5 Packaging

- FedEx Envelope*
- FedEx Pak*
Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.
- FedEx Box
- FedEx Tube
- Other

* Declared value limit \$500.

6 Special Handling

- SATURDAY Delivery
Not available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 3Day Freight.
- HOLD Weekday at FedEx Location
Not available for FedEx First Overnight.
- HOLD Saturday at FedEx Location
Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

Include FedEx address in Section 3.

Does this shipment contain dangerous goods?
One box must be checked.

- No
- Yes
As per attached Shipper's Declaration.
- Yes
Shipper's Declaration not required.
- Dry Ice
Dry Ice, 9, UN 1845 _____ x _____ kg

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.

Cargo Aircraft Only

7 Payment Bill to:

- Sender
Acct. No. in Section will be billed.
- Recipient
- Third Party
- Credit Card
- Cash/Check

Enter FedEx Acct. No. or Credit Card No. below. Obtain Recip. Acct. No.



Total Packages

Total Weight

Total Charges

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Credit Card Auth.

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Our liability is limited to \$100 unless you declare a higher value. See the current FedEx Service Guide for details.

8 NEW Residential Delivery Signature Options If you require a signature, check Direct or Indirect.

DEC 05 2018

No Signature Required
Package may be left without obtaining a signature for delivery. *Fee applies.*

Direct Signature
Anyone at recipient's address may sign for delivery. *Fee applies.*

Indirect Signature
If one is available at recipient's address, anyone at a neighboring address may sign for delivery. *Fee applies.*

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SC Court of Appeals

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