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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**  
JAN 08 2019  
SC Court of Appeals

Case No. 2016-CP-26-02377  
Appellate Case No. 2018-001221

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

vs.

Horry County Zoning Board of Appeals ..... Appellant.

**MOTION FOR EXTENSION TO FILE BRIEF OF RESPONDENT**

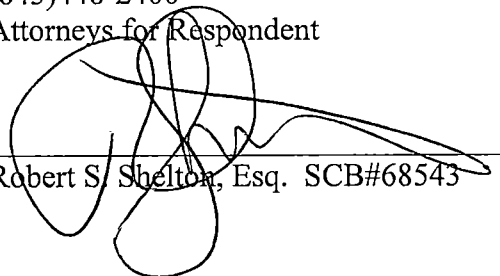
Respondent hereby requests a thirty (30) day extension of time to file the Brief of Respondent due to a family medical crisis. Opposing counsel does not oppose the motion.

The Brief of Respondent is due January 9, 2019 and if this request is granted, the Brief of Respondent will be due on February 9, 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: January 7, 2019

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Court of Common Pleas

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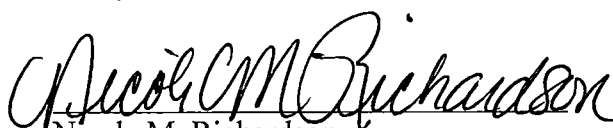
Horry County Zoning Board of Appeals ..... Appellant.

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**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



Nicole M. Richardson  
Paralegal to Robert S. Shelton, Esq.  
BELLAMY, RUTENBERG, COPELAND,  
EPPS, GRAVELY & BOWERS, P.A.  
P.O. Box 357  
Myrtle Beach, SC 29578  
(843)448-2400

Myrtle Beach, South Carolina  
Dated: January 7, 2019

HOWELL V. BELLAMY, JR.  
EDWARD B. BOWERS, JR.\*  
BRADLEY D. KING  
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\* LLM TAXATION  
\*\* LICENSED IN SC & NC  
+ CERTIFIED MEDIATOR  
\*\* CERTIFIED ARBITRATOR



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JON CRAIG HOWELL, JR.  
JAMES C. SPEARS, III \*  
ZACHARY J. CROWL

RETIRED:  
JOHN K. RUTENBERG (1939-2012)  
JOHN E. COPELAND  
CLAUDE M. EPPS, JR.  
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JILL F. GRIFFITH

Writer's Direct Dial: 843-916-7163  
Writer's Email: [RShelton@BellamyLaw.com](mailto:RShelton@BellamyLaw.com)

January 7, 2019

VIA FACSIMILE: 803-734-1839  
AND FEDERAL EXPRESS

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

**RECEIVED**  
JAN 08 2019  
SC Court of Appeals

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 February 9, 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/nmr*  
Robert S. Shelton

RSS:nmr  
Enclosure as noted



January 7, 2019

Page 2

cc: Client  
Emma Ruth Brittain, Esq.  
Matthew R. Magee, Esq.

300

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**2 Your Internal Billing Reference**

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**3 To**

Recipient's Name The Honorable Jenni Robbitt Kitchens Phone 803 734-1890

Company Meine - South Carolina Court of Appeals

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JAN 08 2019



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## SC Court of Appeals

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  - FedEx 2Day  
Second business day. \* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
  - FedEx Express Saver  
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  - FedEx 2Day Freight  
Second business day. \*\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
  - FedEx 3Day Freight  
Third business day. \*\* Saturday Delivery NOT available.
- \*\* To most locations.

\* Call for Confirmation.

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