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JUN 25 2019

S.C. SUPREME COURT

Fax: 803.734.1499

The Honorable Daniel Shearouse
Clerk, South Carolina Supreme Court
1231 Gervais St.
Columbia, SC 29201

Re: *Doe v. BZA et al*
COA App. Case No. 2015-002297

Dear Mr. Shearouse:

Enclosed for filing is the original in the above case along with a request to hold all time limits in abeyance. Also, enclosed are the following:

- 1) Proof of Service,
- 2) Seven (7) copies,
- 3) Filing fee, and
- 4) SASE for return of the file-marked copy.

Thank you for your kind attention to this matter. With best personal regards, I remain

Sincerely yours,

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S.C. SUPREME COURT

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

**APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas**

The Honorable R. Markley Dennis, Jr., Circuit Court Judge

COA Case No. 2015-002297

John Doe,

Appellant,

v.

Board of Zoning Appeals (BZA) and
Town of Sullivans Island (S.I.),
S. I. Zoning Administrator, and
S. I. Building Dept., Individually
and In Official Capacity,

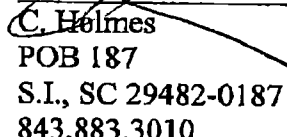
Respondents.

**Motion for Extension of Time to File Cert Petition and
Motion for Abeyance of All Time Limits Pending
Disposition in the COA of Motion for Reconsideration In Light of New Precedent**

C. Holmes
P.O. Box 187
Sullivans Isd.,
SC 29482-0187
(843)883-3010
For Appellant

The appellant respectfully submits Motion for Extension of Time to File Petition for a Writ of Certiorari and Motion for Abeyance of All Time Limits Pending Disposition in the Court of Appeals (COA) on Timely Motion for Reconsideration in Light of New Precedent. Petition for Rehearing was denied on May 23, 2019. On June 12, 2019, remittitur was returned on new precedent in the case of *Citizens for Quality Rural Living, Inc., v. Greenville Cnty. Planning Comm'n* (S.C. App., 2019) (COA Case No. 2017-000170). That case supports reversal of the May 23, 2019, Petition for Rehearing and supports legislative intent for the right to file in the circuit court the notice of BZA appeal with request for mediation. Accordingly, appellant respectfully requests this Court grant this motion with abeyance of all time limits pending disposition on the Motion for Reconsideration in Light of New Precedent in the Court of Appeals.

Respectfully submitted,


C. Holmes
POB 187
S.I., SC 29482-0187
843.883.3010

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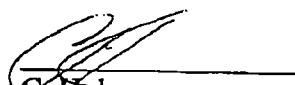
**Board of Zoning Appeals (BZA) and
Town of Sullivans Island (S.I.),
S. I. Zoning Administrator, and
S. I. Building Dept., Individually
and In Official Capacity,**

Respondents.

PROOF OF SERVICE

I certify that I have timely served the foregoing on the Respondents on this date by deposit in the United States Mail, postage prepaid, addressed to Respondents' attorney of record at 66 Hasell St., Charleston, SC 29401.

Dated 6/24/19


C. Holmes
POB 187
S.I., SC 29482-0187
843.883.3010

DURST FAMILY MEDICINE, LLC

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(843) 883-3459

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