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September 5, 2019

VIA HAND DELIVERY

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

RECEIVED

SEP 05 2019

SC Court of Appeals

RE: City of Myrtle Beach, For Itself and a Class of Similarly Situated Plaintiffs, Respondents, v. Horry County, Appellant;
Appellate Case No. 2019-001134

Dear Ms. Kitchings:

Pursuant to Rules 240 and 263(b), of the South Carolina Appellate Court Rules, Respondent City of Myrtle Beach, for Itself and a Class of Similarly Situated Plaintiffs, ("City") respectfully moves this Court for a 30-day extension of time in which to serve its Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal. Appellant Horry County served its Initial Brief of Appellant and Designation of Matter on August 9, 2019; therefore, under Rule 208(b)(2), the City's filings are currently due September 9, 2019.

This request is made in good faith, not for purposes of delay, and is based on the current workload of and demand on counsel for the City with respect to this and other pending matters, and will ensure that the City can meaningfully respond to the County's arguments on appeal. This is the first request for an extension by the City with respect to the Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal. If the Court grants this request, the City calculates that these filings are to be filed and served by October 9, 2019.

Enclosed, please find a check in the amount of \$50.00 for the filing fee. By copy of this letter, I am serving counsel for Appellant and enclose a certificate of service to

OFFICES:

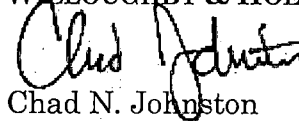
COLUMBIA | 930 RICHLAND STREET, COLUMBIA, SC 29201 | 803.252.3300 FAX 803.256.8062
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The Honorable Jenny Abbott Kitchings
September 5, 2019
Page 2 of 2

that effect. I would appreciate your acknowledging receipt of this request by filed stamping the extra copy of this letter and returning it to me via our courier. If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

WILLOUGHBY & HOEFER, P.A.



Chad N. Johnston

cc: Henrietta U. Golding, Esquire (via U.S. Mail)
James K. Gilliam, Esquire (via U.S. Mail)
Adam R. Artigliere, Esquire (via U.S. Mail)
W. Grayson Lambert, Esquire (via U.S. Mail)

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY

William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2019-001134

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SC Court of Appeals

City of Myrtle Beach, For Itself and a Class of Similarly Situated Plaintiffs, Respondents,

v.

Horry County, Appellant.

CERTIFICATE OF SERVICE

This is to certify that I, Elizabeth Kurtz, a paralegal with the law firm Willoughby & Hoefler, P.A., have caused to be served this day one (1) copy of **Respondent City of Myrtle Beach's Motion for Extension of Time** by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

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Elizabeth Kurtz

Columbia, South Carolina
This 5th day of September, 2019