

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

SEP 09 2019  
SC Court of Appeals

Honorable William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2019-001134

Case No. 2019-CP-26-01732

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

v.

Horry County,.....Appellant.

RESPONSE TO MOTION FOR EXTENSION OF TIME

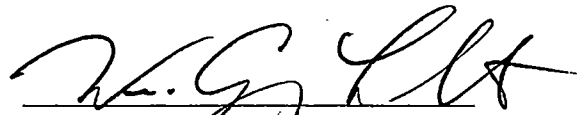
The County, pursuant to Rule 240(e), SCACR, submits this response to the City's request for an extension of time to file its initial brief.

The County objects to this request for two reasons. *First*, this case needs to move as quickly as possible. The County's Hospitality Fee had been in place for twenty-two years before the circuit court enjoined it. As the County pointed out in its petition for a writ of supersedeas and initial brief, the circuit court has not required sufficient security for the injunction, so every day that passes with the injunction in place raises the risk that the County will not be made whole if it prevails on appeal.

*Second*, more time is not necessary. The issues raised in the County's initial brief are many of the same issues that were briefed by both the County and the City in the circuit court and on the petition for a writ of supersedeas. Thus, the City is already familiar with these issues.

Despite the fact that no extension is necessary, the County recognizes that, given this Court's custom of granting extensions and the City's request coming a mere four days before its initial brief was due, some extension is likely to be granted. The County asks that any extension be granted for only ten days, rather than thirty, in light of the need for this case to proceed quickly and the City's familiarity with the issues on appeal.

Respectfully submitted:



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CERTIFICATE OF SERVICE

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I certify that this RESPONSE TO MOTION FOR EXTENSION OF TIME was  
served on counsel for the Respondent via hand delivery on September 9, 2019:

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