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City of Charleston

September 11, 2019

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SC Court of Appeals

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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OF COUNSEL

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RE: RE: National Trust for Historic Preservation v. City of
North Charleston
Appellate Case No. 2019-000728

Dear Ms. Kitchings:

Please be advised that I represent Respondent/Appellant City of Charleston ("Charleston") in the above-referenced matter. As I noted in a previous letter, I received a copy of the transcript of the underlying hearing on August 23, 2019. As a result, pursuant to Rule 208 and Rule 209(a), SCACR, Charleston's initial brief and designation of matter typically would be due on or before September 23, 2019.

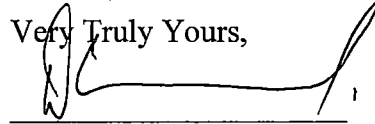
This case involves multiple notices of appeal. Pursuant to Rule 206, SCACR, "[u]pon receipt of notification that the primary appellant has received the transcript of the proceeding, the clerk of the appellate court shall establish a briefing schedule." To date, Charleston has not received notification of any briefing schedule. Appellant/Respondent City of North Charleston previously served and filed an initial brief and designation of matter in this action, and the briefing schedule is the subject of separate pending motions by Charleston and Respondent/Appellant National Trust for Historic Preservation in the United States.

In an abundance of caution, I am writing to request a thirty (30) day extension of the deadline in which to serve and file Charleston's initial brief and designation of matter, under the assumption that the initial brief and designation of matter are currently due on September 23, 2019, so that Charleston's initial brief and designation of matter would be due on or before October 23, 2019. No previous extension of this deadline has been requested by or granted to Charleston.

I have enclosed a check for the filing fee of \$50.00 for this request. By copy of this letter to all other counsel of record, I am advising them of this request. Your courtesies and consideration of this matter are greatly appreciated.

With kindest regards, I am,

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Daniel S. McQueeney, Jr.", with a long horizontal flourish extending to the right.

Daniel S. ("Chip") McQueeney, Jr.

S.C. Bar No. 06802

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