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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SEP 23 2019
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Eugene C. Griffith, Jr., Circuit Court Judge

Appellate Case No. 2019-000728

National Trust for Historic Preservation in the United States and the
City of Charleston Respondents/Appellants,

v.

City of North CharlestonAppellant/Respondent.

**RESPONDENT/APPELLANT NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES'
MOTION FOR FIRST EXTENSION OF TIME TO FILE
INITIAL BRIEFS AND DESIGNATION OF MATTER**

Pursuant to Rules 240 and 263(b), SCACR, Respondent/Appellant, National Trust for Historic Preservation in the United States ("Trust"), by and through its undersigned counsel, hereby moves the Court for an order granting Respondent/Appellant Trust a thirty (30) day extension of time, until October 23, 2019, in which to file and serve Respondent/Appellant Trust's Initial Briefs and Designation of Matter. The deadline for filing Respondent/Appellant Trust's Briefs and Designation of Matter is September 23, 2019. Respondent/Appellant Trust would submit that the extension is necessary due to counsel's current schedule and case load. This deadline has not previously been extended.

Counsel has conferred with counsel for the Appellant/Respondent, who consents to this Motion.

This Motion is made for good cause, in good faith, and not for the purposes of delay.

Respectfully submitted,

WALKER GRESSETTE FREEMAN & LINTON, LLC



G. Trenholm Walker (S.C. Bar No. 5777)

John P. Linton, Jr., (S.C. Bar No. 79130)

P.O. Box 22167

Charleston, SC 29413

T: (843) 727-2200

WALKER@WGFLAW.COM

LINTON@WGFLAW.COM

ATTORNEYS FOR RESPONDENT/APPELLANT,
NATIONAL TRUST FOR HISTORIC PRESERVATION
IN THE UNITED STATES

September 19, 2019
Charleston, South Carolina

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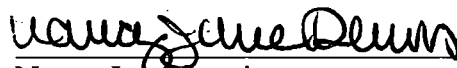
PROOF OF SERVICE

I certify that I have served the **Respondent/Appellant National Trust for Historic Preservation's Motion for First Extension of Time to File An Initial Brief and Designation of Matter** by depositing a copy in the United States Mail, postage prepaid, on September 19, 2019, addressed to the attorneys of record:

Derk Van Raalte, IV
J. Brady Hair
Law Office of Brady Hair
P.O. Box 61896
North Charleston, SC 29419
Attorneys for Appellant/Respondent

Frances I. Cantwell
Daniel Simmons McQueeney, Jr.
Susan J. Herdina
City of Charleston Legal Department
50 Broad Street
Charleston, SC 29401

*Attorneys for Respondent/Appellant The City
of Charleston*



Nancy Jane Dennis
Paralegal

G. TRENHOLM WALKER
Direct: 843.727.2208
Email: Walker@WGFLAW.com

September 19, 2019

US MAIL [X] FEDERAL EXPRESS[]

Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: National Trust for Historic Preservation v. City of North Charleston
Appellate Case No. 2019-000728
WGFL File No.: 8081.001

Dear Ms. Kitchings:

Enclosed please find the original and six copies of Respondent/Appellant National Trust's Motion for Extension of Time to File Initial Brief and Designation of Matter with Proof of Service and \$50 filing fee. I have consulted with opposing counsel who has no objection to the extension.

Your courtesies and consideration of this matter are greatly appreciated.

Sincerely yours,

WALKER GRESSETTE FREEMAN & LINTON, LLC



G. Trenholm Walker

Enclosures (Motion, POS, and Check)

c: Derk Van Raalte, IV, Esq.
J. Brady Hair, Esq.
Frances I. Cantwell, Esq.
Daniel S. McQueeney, Jr., Esq.
Susan J. Herdina, Esq.
Anne Nelson, Esq.

WALKER
GRESETTE
FREEMAN
LINTON LLC

66 Hasell Street, Charleston, SC 29401
PO Box 22167, Charleston, SC 29413

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SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
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Columbia, SC 29211

