

9/14/19

November 13, 2019



City of Charleston

WILLIAM B. REGAN LEGAL CENTER

50 Broad Street
Charleston, SC 29401
tel 843-724-3730
fax 843-724-3706

CORPORATION COUNSEL

Susan J. Herdina
herdinas@charleston-sc.gov

ASSISTANT CORPORATION COUNSEL

Janie E. Borden
bordenj@charleston-sc.gov

Stirling Halversen
halversens@charleston-sc.gov

Daniel S. ("Chip") McQueeney, Jr.
mcqueeneyd@charleston-sc.gov

OF COUNSEL

Frances I. Cantwell
cantwellf@charleston-sc.gov

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

RE: City of Charleston v. City of North Charleston
Appellate Case No. 2019-000903

Dear Ms. Kitchings:

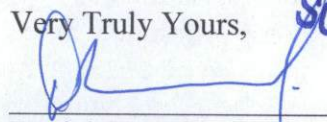
Please be advised that I represent Appellant City of Charleston ("Appellant") in the above-referenced matter. Appellant's initial reply brief to the "Respondent's Brief" filed by Respondent City of North Charleston and any designation of matter in reply are currently due on November 15, 2019. To date, Charleston has not yet received the initial "Respondent's Brief" on Respondent Millbrook Plantation LLC.

I am writing to request a ten (10) day extension of the deadline in which to serve and file Appellant's initial reply brief and designation of matter, so that Appellant's initial reply brief and designation of matter would be due on or before November 25, 2019.

No previous extension of this deadline has been requested by or granted to Appellant. 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,


Daniel S. ("Chip") McQueeney, Jr.
S.C. Bar No. 06802
50 Broad Street
Charleston, South Carolina 29401
E-mail: mcqueeneyd@charleston-sc.gov
(843) 724-3730
Attorney for Appellant City of Charleston

RECEIVED
NOV 15 2019
SC Court of Appeals

c: J. Brady Hair, Esquire
Derk Van Raalte
Bruce E. Miller, Esquire



City of Charleston
Legal Department
PO Box 304
Charleston, SC 29402

RECEIVED

NOV 15 2019
SC Court of Appeals

CHARLESTON SC 294

13 NOV 2019 PM 3 L



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

29211-162929

