

**PRICE BENOWITZ LLP**

1614 TAYLOR STREET  
SUITE D  
COLUMBIA, SC 29201

OFFICE: (803) 272-4503  
DIRECT: (803) 807-0234  
FAX: (803) 380-8035

DAVID BENOWITZ  
ADMITTED DC, MD & VA  
KERRI CASTELLINI  
ADMITTED DC & MD  
KUSH ARORA  
ADMITTED MD & DC  
JOHN YANNONE  
ADMITTED MD & DC  
SHAWN SUKUMAR  
ADMITTED DC  
VIRGINIA TEHRANI  
ADMITTED DC, MD & VA  
TAMMY BEGUN  
ADMITTED MD  
TONY MUNTER  
ADMITTED DC & MA  
JESSE STEIN  
ADMITTED DC, MD, VA & NY  
FARRAL HABER  
ADMITTED FL, VA & DC  
ARREN WALDREP  
ADMITTED DC, MD & SC  
MOHSEN ZARKESH  
ADMITTED DC  
MATTHEW WILSON  
ADMITTED MD & DC  
ROBERT MIDDLETON, JR.  
ADMITTED MD  
DAVID CLARK  
ADMITTED PA  
FLOYD OLIVER  
ADMITTED VA

SETH PRICE  
ADMITTED DC & NY  
DAYNE PHILLIPS  
ADMITTED SC  
GLENN F. IVEY  
ADMITTED DC & MD  
KARIN RILEY PORTER  
ADMITTED VA  
STEVEN L. DUCKETT, JR.  
ADMITTED VA  
JOEL NIED  
ADMITTED VA, PA & GA  
THOMAS C. SOLDAN  
ADMITTED VA  
SETH OKIN  
ADMITTED MD  
OLEG FASTOVSKY  
ADMITTED MD  
MITCHELL GREENBERG  
ADMITTED MD & DC  
NATALIA SEGERMEISTER  
ADMITTED NY  
MARY NERINO  
ADMITTED VA  
PATRICK WOOLLEY  
ADMITTED VA  
NICHOLAS M. BRASWELL  
ADMITTED VA  
MICHAEL HARTLEY  
ADMITTED VA  
ANDREW LINDSEY  
ADMITTED VA  
KIARA SWINTON  
ADMITTED VA

**RECEIVED**  
NOV 08 2019  
SC Court of Appeals

\*OF COUNSEL

110 NORTH WASHINGTON STREET, SUITE 303  
ROCKVILLE MD 20850

10505 JUDICIAL DRIVE, SUITE 101  
FAIRFAX, VA 22030

November 8, 2019

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: **Thomas Ford, III v. Town of Hardeeville**  
SECOND MOTION FOR EXTENSION OF TIME  
Appellate Case No.: 2019-001107

Dear Ms. Kitchings:

The Initial Brief and Designation of Matter for the above-referenced appeal are due on Tuesday, November 12, 2019. I respectfully request a thirty (30) day extension of this deadline. This is my **second** request for an extension of time, and it is not intended for purposes of delay (as it is reasonable and necessary due to my work and court schedule).

Please note that I will notify opposing counsel, Justin D. Maines, Esq. of this request via email.

[Page 1 of 2]

WWW.SCCRIMINALLAWS.COM

WWW.PRICEBENOWITZ.COM

**Thomas Ford, III v. Town of Hardeeville**  
SECOND MOTION FOR EXTENSION OF TIME  
Appellate Case No.: **2019-001107**  
November 8, 2019  
Page 2 of 2

Thank you for your assistance in this matter. Your consideration is greatly appreciated. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Dayne Phillips", written over a horizontal line.

Dayne C. Phillips, Esq.  
Price Benowitz LLP  
1614 Taylor Street, Suite D.  
Columbia, SC 29201  
O: 803-272-4503  
C: 803-807-0234  
F: 803-380-8035  
dayne@pricebenowitz.com

cc: **Justin D. Maines, Esq.**  
**Thomas Ford, III**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the within and foregoing Motion for Extension of Time by hand-delivering a true and correct copy of the same upon:

**The Honorable Jenny A. Kitchings**  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

I hereby certify that I have this date served the within and foregoing Motion for Extension of Time by depositing a true and correct copy of the same via first-class mail, postage prepaid, and via electronic mail, upon:

**Justin D. Maines, Esq.**  
2008 Whitaker Street  
Savannah, Georgia 31401

**RECEIVED**

NOV 08 2019

SC Court of Appeals

By: Courtney Powers  
**Courtney Powers**  
*Paralegal for Dayne C. Phillips, Esq.*

1614 Taylor Street, Suite D.  
Columbia, SC 29201  
C: (803) 216-5561  
courtney@pricebenowitz.com

**November 8, 2019**