

9/16/91

STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge  
Case No. 2017-CP-10-5382  
Appellate Case No. 2019-001125

South Carolina Department of Commerce,  
Division of Public Railways,

v.

Gateway Properties of Greater Charleston, LLC,

and

NBSC a division of Synovus Bank, VFC Partners 15 LLC, Capella Carolinas, LLC,  
Donivon Glassburn, and the Loft Pilates Center, LLC,

Appellant,

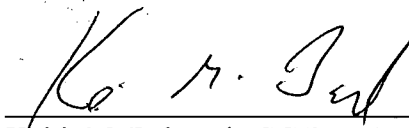
Respondent,

Other Condemnees.

**RECEIVED**  
DEC 17 2019  
SC Court of Appeals

APPELLANT'S MOTION FOR EXTENSION OF TIME

Appellant South Carolina Department of Commerce, Division of Public Railways respectfully moves for an extension of time in which to file its reply brief, currently due December 26, 2019. Appellant requests this extension due to competing briefing deadlines. Counsel for Respondent has indicated that they do not object to this extension. Thus, Appellant seeks an additional ten days in which to file its reply brief, making the revised due date January 6, 2020. This is Appellant's first request for an extension.



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Post Office Box 11208  
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Attorneys for APPELLANT South Carolina  
Department of Commerce, Division of Public  
Railways

Columbia, South Carolina  
December 17, 2019

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
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The Honorable Alex Kinlaw, Jr.  
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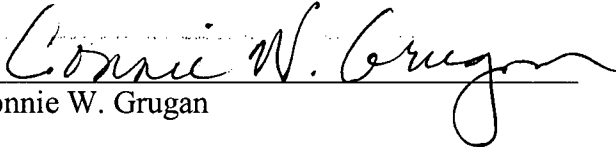
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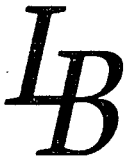
I, Connie W. Grugan, legal assistant to the law firm of Lewis Babcock L.L.P., hereby certify that I have served the Appellant's Motion for Extension of Time upon opposing counsel by mailing a copy of same, postage prepaid and return address clearly indicated, to said counsel addressed as follows:

G. Trenholm Walker, Esquire  
John Phillips Linton, Jr., Esquire  
Walker Gressette Freeman & Linton, LLC  
Post Office Box 22167  
Charleston, South Carolina 29413

Robert S. Dodds, Esquire  
Cisa & Dodds, LLP  
1156 Bowman Road, Suite 200  
Mount Pleasant, South Carolina 29464

  
\_\_\_\_\_  
Connie W. Grugan

This 17<sup>th</sup> day of December, 2019.



LAW OFFICES OF  
**LEWIS  
BABCOCK**  
L.L.P.

**KEITH M. BABCOCK**  
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December 17, 2019

HAND DELIVERED  
Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**

DEC 17 2019

SC Court of Appeals

Re: South Carolina Department of Commerce, Division of Public Railways v.  
Gateway Properties of Greater Charleston, LLC, et al.  
Case No. 2019-001125

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Appellant's Motion for Extension of Time, along with a \$50.00 filing fee, in regard to the above-referenced matter for filing with your office. Please return a clocked copy via our courier.

By copy of this letter, we are hereby serving a copy of same upon opposing counsel.

Very truly yours,

Keith M. Babcock

KMB:cg  
Enclosure

cc: G. Trenholm Walter, Esquire  
John Phillips Linton, Jr., Esquire  
Robert S. Dodds, Esquire