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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

RECEIVED

JAN 31 2020

Case No.: 2017-CP-10-4947
Appellate Case No.: 2019-001843

SC Court of Appeals

Dana and John Stortz, Appellants

v.

The State of South Carolina, City of North Charleston, County of Charleston,
Department of Health and Environmental Control, South Carolina Department of
Transportation, John Doe (Engineering Firm/Engineer), Coosaw Creek Owners'
Association, Inc., ... Defendants,

Of Which, The State of South Carolina, City of North Charleston, County of
Charleston, Department of Health and Environmental Control, South Carolina
Department of Transportation, John Doe (Engineering Firm/Engineer), Coosaw
Creek Owners' Association, Inc., are the Respondents.

Motion for an Extension of Time to File Initial Brief of Respondent

Respondent Coosaw Creek Owners' Association, Inc. ("Coosaw") respectfully requests a 30-day extension of time to file its Initial Brief in the above captioned appeal. This is Respondent Coosaw's first request for an extension of time with this Court.

Based on the Appellant's Initial Brief filed on January 8, 2020, and apparent intended service on January 6, 2020,¹ the Brief of Respondent Coosaw is due on February 5, 2020. With a 30-day extension request, the new deadline would run through March 6, 2020.

Therefore, Coosaw request that the Court enter an order extending the deadline for Respondent Coosaw's Initial Brief through March 6, 2020. Respondent Coosaw requests that the current deadline be held in abeyance while the Court considers this request.

January 28, 2020

WALL TEMPLETON & HALDRUP, P.A.



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Other Counsel of Record:

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North Charleston, SC 29406
Attorneys for Plaintiff/Appellant

I. Keith McCarty
1212 Wappoo Road
Charleston, SC 29407
Attorney for Plaintiff/Appellant

¹ Appellant listed January 6, 2019 date on the Proof of Service. Presumably this was a clerical error, and the correct date is January 6, 2020.

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Charleston, Department of Health and Environmental Control, South Carolina
Department of Transportation, John Doe (Engineering Firm/Engineer), Coosaw
Creek Owners' Association, Inc., are the Respondents.

PROOF OF SERVICE

I, David Nasrollahi, of Wall Templeton & Haldrup, do hereby certify that I have served
Respondent's Motion for Extension of Time by depositing the same in the United States Mail,
properly posted on January 28th, 2020 addressed as follows to counsel of record:

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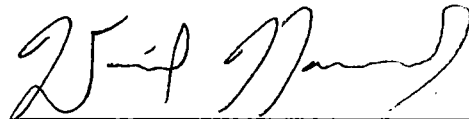
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January 28, 2020

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

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SC Court of Appeals

Re: *Stortz vs. The State of South Carolina, et al*
Appellate Case No: 2019-001843

Dear Ms. Kitchings:

Please find enclosed an original and seven copies of a Motion for Extension of Time and Proof of Service in the above referenced matter. Please file the original and return a filed-stamped copy to me in the envelope provided for your convenience. We have also enclosed the \$50.00 filing fee.

By copy of this letter to counsel of record, I am serving them with the enclosed Motion.

Thank you for your time and attention to this matter.

Sincerely,

WALL TEMPLETON & HALDRUP, P.A.

David A. Nasrollahi

DAN:are
Enclosures

cc: All Counsel of Record (via email only)



First Class Mail



Wall Templeton
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The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
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