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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

Appellate Case No.: 2019-001843

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FEB 03 2020
SC Court of Appeals

Dana Stortz 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 City of The State of South Carolina, City of North Charleston, County of Charleston, Department of Health and Environmental Control, South Carolina Department of Transportation, and 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

BUYCK & SANDERS, LLC
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Hugh W. Buyck, Esquire
305 Wingo Way
P.O. Box 2424
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Telephone: (843) 377-1400
Facsimile: (843) 284-8105
Attorneys for The State of South Carolina
And County of Charleston

Respondents The State of South Carolina and County of Charleston respectfully request a 30-day extension of time to file its Initial Brief in the above captioned appeal. This is Respondents The State of South Carolina and County of Charleston'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, the Brief of Respondents The State of South Carolina and County of Charleston is due on February 5, 2020. With a 30-day extension request, the new deadline for these Respondents would run through March 6, 2020.

Therefore, The State of South Carolina and County of Charleston requests that the Court enter an order extending the deadline for Respondents The State of South Carolina and County of Charleston's Initial Brief through March 6, 2020. Respondents The State of South Carolina and County of Charleston request that the current deadline be held in abeyance while the Court considers this request.

January 30, 2020



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Counsel for The State of South Carolina and County
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Other Counsel of Record:

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Proof of Service

I, G. Wade Cooper, of Buyck & Sanders, do hereby certify that I have served Respondents' Motion of Extension of Time by depositing same in the United States Mail, properly posted on this 30th day of January 2020 addressed as follows to counsel of record:

Jarrell L. Wigger, Esquire
Wigger Law Firm
8086 Rivers Ave., Suite A
North Charleston, SC 29406

I. Keith McCarty, Esquire
McCarty Law Firm, LLC
1212 Wappoo Rd.
Charleston, SC 29407

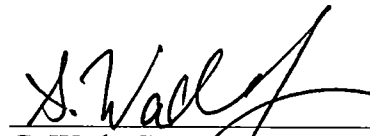
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A handwritten signature in black ink, appearing to read "G. Wade Cooper", written over a horizontal line.

G. Wade Cooper
Buyck & Sanders, LLC
P.O. Box 2424
Mt. Pleasant, SC 29465

BUYCK & SANDERS, LLC

ATTORNEYS & COUNSELORS AT LAW

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Hugh W. Buyck
Darren K. Sanders

G. Wade Cooper
H. Lucius Laffitte, III

January 30, 2020

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

Re: Stortz vs The State of South Carolina, et al.
Appellate Case No.: 2019-001843
BSLF File No. 12.03

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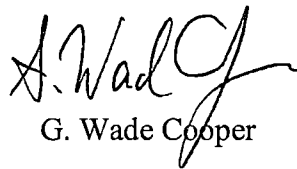
Dear Ms. Kitchings:

Please find enclosed an original and six (6) copies a Motion for Extension of Time and Proof of Service on behalf of The State of South Carolina and the County of Charleston. Please file the original and return a file-stamped copy to me in the postage paid envelope. The requisite \$50.00 filing fee is enclosed.

By copy of this correspondence with enclosures, I am hereby serving same on all counsel of record. Please contact me should you have any questions regarding this matter.

With kind regards,

Yours truly,


G. Wade Cooper

GWC:mgf
Enclosure

cc: Jarrell L. Wigger, Esquire (w/enclosure)
I.Keith McCarthy, Esquire (w/enclosure)
Jonathon J. Anderson, Esquire (w/enclosure)
Phillip S. Ferderigos, Esquire (w/enclosure)
Robert T. Lyles, Jr, Esquire (w/enclosure)
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SC Court of Appeals

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