

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Deadra L. Jefferson

**RECEIVED**

FEB 04 2020

SC Court of Appeals

Appellate Case No. 2019-001910  
Common Pleas Case No. 2019-CP-10-1434

David Abdo,.....Appellant,

v.

City of Charleston and Board of Zoning Appeals-Zoning, ..... Respondents.

**APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE AND  
SERVE INITIAL BRIEF AND DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to South Carolina Appellate Court Rules 240 and 263(b), Appellant David Abdo moves this Honorable Court to grant an extension of time to serve and file Appellant’s Initial Brief and Designation of Matter to be Included in the Record on Appeal. The deadline to file was February 3, 2020. This request is being made due to the undersigned’s recent work-related commitments that have included a three-day arbitration from January 27, 2020 through January 29, 2020, mediation on January 30, 2020, and a four-day trial scheduled for February 3, 2020 which is underway, and likely to continue through February 6, 2020. For this reason, Appellant

respectfully requests an extension of time until March 4, 2020 to serve and file Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,



February 4, 2020

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John A. Massalon, Esquire (SC Bar #10279)  
WILLS MASSALON & ALLEN LLC  
Post Office Box 859  
Charleston, South Carolina 29402  
(843) 727-1144  
[jmassalon@wmalawfirm.net](mailto:jmassalon@wmalawfirm.net)

ATTORNEYS FOR APPELLANT  
DAVID ABDO

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David Abdo, .....Appellant,


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**PROOF OF SERVICE**

I certify that I have served Appellant's Motion for Extension of Time to File and Serve Initial Brief and Designation of Matter to be Included in the Record on Appeal on Respondents City of Charleston and Board of Zoning Appeals-Zoning by hand delivery to their attorney of record, Daniel S. McQueeney, Jr. at 50 Broad Street, Charleston, South Carolina 29401.

February 4, 2020

  
\_\_\_\_\_  
John A. Massalon, Esquire (SC Bar #10279)  
WILLS MASSALON & ALLEN LLC  
Post Office Box 859  
Charleston, South Carolina 29402  
(843) 727-1144  
[jmassalon@wmalawfirm.net](mailto:jmassalon@wmalawfirm.net)

ATTORNEYS FOR APPELLANT  
DAVID ABDO

**Wills Massalon & Allen LLC**

PINNACLE BANK  
88-1209/531

10745

Operating Account  
Post Office Box 859  
Charleston, South Carolina 29402  
(843) 727-1144

02/04/2020

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MEMO

Filing Fee: Motion for Extension (731-4)

Wills Massalon & Allen LLC  
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South Carolina Court of Appeals

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Filing Fee: Motion for Extension (731-4)

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# WMA

WILLS MASSALON & ALLEN LLC

97 Broad Street • Charleston, SC 29401 • Post Office Box 859 • Charleston, SC 29402  
Phone: 843-727-1144 • Fax: 843-727-7696 • [www.wmalawfirm.net](http://www.wmalawfirm.net)

February 4, 2020

Direct Dial: (843) 793-6039

**VIA FACSIMILE AND U.S. MAIL**

The Honorable Jenny Abbott Kitchings- (803) 734-1839  
Clerk of Court, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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FEB 04 2020  
SC Court of Appeals

RE: David Abdo v. City of Charleston and Board of Zoning Appeals-Zoning  
Appellate Case No.: 2019-001910  
Common Pleas Case No.: 2019-CP-10-1434  
Our File No.: 731-4

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Appellant's Motion for Extension of Time to File and Serve Initial Brief and Designation of Matter to be Included in the Record on Appeal and Proof of Service in regard to the above-referenced matter. In addition, please find my firm's Check No. 10745 in the amount of \$50.00 representing the filing fee. Please return one (1) file-stamped copy to me in the self-addressed, stamped envelope provided. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC



John A. Massalon  
[jmassalon@wmalawfirm.net](mailto:jmassalon@wmalawfirm.net)

JAM/cb  
Enclosures

cc: Daniel S. ("Chip") McQueeney, Jr., Esquire (via hand delivery)  
Ilonka Sonja Taylor, Esquire (via e-mail)  
Mr. David Abdo (via e-mail)

# WMA

WILLS MASSALON & ALLEN LLC

97 Broad Street • Charleston, SC 29401 • Post Office Box 859 • Charleston, SC 29402  
Phone: 843-727-1144 • Fax: 843-727-7696 • [www.wmalawfirm.net](http://www.wmalawfirm.net)

To: The Honorable Jenny Abbott Kitchings  
Fax No.: 803-734-1839  
From: John A. Massalon  
Date: February 4, 2020  
RE: David Abdo v. City of Charleston, et al.  
Appellate Case No.: 2019-001910  
WMA File No.: 731-4

**Number of pages including this cover page: 6**

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