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Mar 04 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Maite Murphy, Circuit Court Judge

Appellate Case No. 2020-001387
Case No. 2017-CP-10-5493

Shem Creek Development Group, LLC,Respondent,

v.

The Town of Mount Pleasant, South Carolina.....Appellant.

RESPONDENT’S MOTION FOR EXTENSION OF TIME

Pursuant to South Carolina Appellate Court Rules 240 and 263(b), Respondent Shem Creek Development Group, LLC moves for an additional extension of thirty (30) days from the existing deadline of March 17, 2021 to file Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal in this matter. Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal will be due on or before April 16, 2021 if the extension is granted.

Respondent respectfully submits that an additional thirty (30) day extension to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal is appropriate due to Respondent’s counsel’s existing work demands, current out-of-state travel, and previous work disruptions caused by counsel’s children quarantining due to COVID-19 exposure. Appellant’s counsel consents to this request.

For the reasons set forth herein, Respondent requests an additional thirty (30) day extension to serve and file its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,



E. Brandon Gaskins (S.C. Bar No. 73274)
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Attorney for Respondent
Shem Creek Development Group, LLC

March 4, 2021
Charleston, South Carolina

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v.

The Town of Mount Pleasant, South Carolina.....Appellant.

PROOF OF SERVICE

This is to certify that I have this day served counsel for the Appellant in the foregoing matter with a copy of the foregoing **RESPONDENT’S MOTION FOR EXTENSION OF TIME** by electronic mail and by depositing the same in the United States Mail with adequate postage affixed thereon to ensure delivery, addressed as follows:

Andrew F. Lindemann
Lindemann & Davis, P.A.
5 Calendar Court, Suite 202
P.O. Box 6923
Columbia, SC 29260

and

Claudius O. Tackett, II
Claude Tackett Law Firm, LLC
P.O. Box 429
Mount Pleasant, SC 29465

and

David Pagliarini
Corporation Counsel
Town of Mount Pleasant
100 Ann Edwards Lane
Mount Pleasant, SC 29465

*Attorneys for Appellant
Town of Mount Pleasant, South Carolina*



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*Attorney for Respondent
Shem Creek Development Group, LLC*

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SC Court of Appeals

Moore & Van Allen

VIA EMAIL ONLY

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

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Re: Shem Creek Development Group, LLC v. The Town of Mount Pleasant, South Carolina
Appellate Case No.: 2020-001387
Civil Action No.: 2017-CP-10-05493
MVA File No.: 043920.000001

Moore & Van Allen PLLC

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Mailing Address:
Post Office Box 22828
Charleston, SC 29413-2828

Dear Ms. Kitchings:

Pursuant to Section (c)(6) of the Supreme Court's Amended Order regarding Operation of the Appellate Courts During the Coronavirus Emergency dated May 29, 2020, please accept the enclosed **Respondent's Motion for Extension of Time** and **Proof of Service** for filing in the above matter.

By copy of this letter, I am serving Appellant's attorneys with a copy of the Motion for Extension of Time.

Thank you for your assistance with this matter. If you have any questions or concerns, please don't hesitate to contact me.

Sincerely,



E. Brandon Gaskins

EBG/lp

Enclosure: As stated.

cc: **VIA EMAIL AND U.S. MAIL**
Andrew F. Lindemann, Esquire
David G. Pagliarini, Esquire
Claudius O. Tackett, II, Esquire

Charlotte, NC
Charleston, SC