

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals  
Case No. 2020-001626

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**RECEIVED**  
**Mar 22 2021**  
SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Maite Murphy, Circuit Court Judge

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Appellate Case No. 2020-001626

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Exquis Event Center,

Appellant,

v.

BRE Retail NP Festival Centre,

Respondent.

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RESPONDENT'S MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER

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NOW COMES Respondent BRE Retail NP Festival Centre Owner, LLC, through counsel, pursuant to Appellate Rules 208, 209, 240 and 263, and hereby moves for an extension of time to file its Initial Brief and Designation of Matter. In support thereof, Respondent states the following:

- 1) On December 14, 2020, Appellant filed its Notice of Appeal.
- 2) There is no transcript of proceedings below.
- 3) On March 1, 2021, Appellant filed its Initial Brief and Designation of the Matter.

4) Accordingly, Respondent's Initial Brief and Designation of the Matter are currently due on or before March 31, 2021. This motion is therefore timely made.

5) Respondent's counsel needs additional time to confer with its client regarding this appeal and to prepare the Initial Brief and Designation of the Matter.

6) Respondent's counsel certifies that this motion is made in good faith and not for mere delay or other improper purpose. This is Respondent's first request for an extension of time.

7) Counsel for Appellant does not oppose this motion.

8) Of note, Appellant's Initial Brief and Designation of the Matter were filed outside of time and more than forty-five (45) days after the applicable deadline. Notwithstanding the foregoing, the Court recently granted Appellant's motion for extension of time.

WHEREFORE, for all of the foregoing reasons, and for good cause shown, Respondent respectfully requests a thirty (30) day extension of time to file its Initial Brief and Designation of the Matter, through and including April 30, 2021.

This the 22<sup>nd</sup> day of March, 2021.

/s/ Christian H. Staples

Christian H. Staples

S.C. Bar # 101470

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*Counsel for Respondent*

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER was electronically filed by emailing a copy thereof to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org). I further hereby certify that the foregoing document was served on all counsel of record in this action by emailing a copy to [tristan@shafferlawsc.com](mailto:tristan@shafferlawsc.com).

This the 22<sup>nd</sup> day of March, 2021.

*/s/ Christian H. Staples*  
Christian H. Staples  
Shumaker, Loop & Kendrick, LLP