

**RECEIVED**

**May 24 2021**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM THE CHARLESTON COUNTY MASTER IN EQUITY  
Mikell R. Scarborough, MIE

Appellate Case No.: 2021-000437

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Point Farm Investors, LLC, and American Mitigation Company, LLC.....Appellants

vs.

The State of South Carolina.....Respondent

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**MOTION TO EXTEND TIME TO FILE  
APPELLANTS' INITIAL BRIEF**

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YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellants Point Farm Investors, LLC and American Mitigation Company, LLC, moves the Court for an order extending by thirty (30) days to June 24, 2021 the deadline to file Appellants' Initial Brief in the above-captioned case.

Appellants' request for an extension is based on workload constraints and other deadlines and hearing dates which conflict with the deadline for filing the Initial Brief. Respondent State of South Carolina's counsel has agreed to this extension. Wherefore, Appellants respectfully request that the Court grant them until June 24, 2021 to file their Initial Brief.

s/ Mary D. Shahid

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Mary D. Shahid, SC Bar No. 1794

NEXSEN PRUET, LLC

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*Attorneys for Appellants*

*Point Farm Investors, LLC, and American Mitigation  
Company, LLC*

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APPEAL FROM THE CHARLESTON COUNTY MASTER IN EQUITY  
Mikell R. Scarborough, MIE

Case No.: 2020-CP-10-01841

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Point Farm Investors, LLC, and American Mitigation Company, LLC.....Appellants

vs.

The State of South Carolina.....Respondent

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**PROOF OF SERVICE**

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I, Mary D. Shahid, Esquire, hereby certify that on May 24, 2021, I served a copy of the **Motion to Extend Time to File Appellants' Initial Brief** on counsel for the Respondent, via electronic mail

and U.S. mail addressed as follows:

J. Emory Smith, Jr., Deputy Solicitor General  
Office of the Attorney General  
P.O. Box 11549  
Columbia, SC 29211

s/ Mary D. Shahid  
Mary D. Shahid, Esquire

Charleston, South Carolina  
May 24, 2021

May 24 2021

SC Court of Appeals

Mary D. Shahid  
Member  
Admitted in SC

May 24, 2021

VIA ELECTRONIC MAIL [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211


Re: Point Farm Investors, LLC, et al. v. State of South Carolina  
Appellate Case No. 2021-000437

Dear Ms. Kitchings:

Enclosed for filing please find the *Motion to Extend Time to File Appellants' Initial Brief*. Please return a stamped copy to us.

Thank you for your assistance in this matter.

Very truly yours,



Mary D. Shahid

MDS/mk

cc: J. Emory Smith, Jr., Esq.

Austin

**Charleston**

Charlotte

Columbia

Greensboro

Greenville

Bluffton / Hilton Head

Myrtle Beach

Raleigh