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Jul 16 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Jennifer B. McCoy, Circuit Court Judge

Case No. 2020-CP-10-03549

Appellate Case No: 2021-000105

Fred Holland Realty, Inc., and LaJuan Kennedy.....Appellants

v.

The City of Folly Beach.....Respondent.

**MOTION FOR EXTENSION OF TIME
TO FILE PROOF OF SERVICE OF THE RECORD ON APPEAL OF APPELLANTS
FRED HOLLAND REALTY, INC.,
AND LAJUAN KENNEDY**

Appellants, Fred Holland Realty, Inc., and LaJuan Kenney, by and through their undersigned counsel of record, respectfully moves this Court for a thirty (30) day extension of time within which to Compile the Record on Appeal and file the Proof of Service for the Record on Appeal on behalf of Appellants.

In support of their motion Appellants state the following:

1. Presently, Appellants' Record on Appeal and Proof of Service of the Record on Appeal is due to be served and filed on or before July 20, 2021. The Appellants are filing this motion to request an additional period of thirty (30) days within which to file and serve Appellant's Record on Appeal and Proof of Service of the Record on Appeal of Appellants.

2. The undersigned counsel of record requires additional time to prepare and file the

the Record on Appeal and Proof of Service for the Record of Appeal. The basis for this requests is that the undersigned counsel has had over the last month a very hectic family court schedule, including some emergency family court hearings; and in addition, thereafter, his Legal Assistant/Secretary was away from the office for a week on her annual beach vacation, leaving the office shorthanded during that time, and then counsel has since been away from the Office this week for his long planned family vacation, and therefore he needs additional time to finalize and file Appellants' Proof of Service for the Record on Appeal.

WHEREFORE, the Respondent respectfully request that he be allowed additional time, through and including August 20, 2021, by which to file and serve Appellants' Record on Appeal and Proof of Service for the Record on Appeal.

July 16, 2021

s/John Carrigg
JOHN CARRIGG
120 North Lake Drive
Lexington, S.C. 29072
(803) 785-5511
(803) 785-5513
SC Bar # 0015239
jcarrigg@carrigglaw.com
Attorney for Appellants

Other Counsel of Record:

Joseph C. Wilson, IV
P.O. Box 178
Folly Beach, S.C. 29439

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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time To File Proof of Service of Record on Appeal of Appellants Fred Holland Realty, Inc., and LaJuan Kennedy on the above-listed Respondent by depositing a copy of it in the United States Mail, postage prepaid, on July 16, 2021 addressed to Respondent's attorneys of record as detailed below, and have served the same via email to the following email address: jwilson@cityoffollybeach.com

July 16, 2021.

s/John Carrigg
John Carrigg
120 North Lake Drive
Lexington, South Carolina 29072
(803) 785-5511
(803) 785-5513 (fax)
SC Bar # 0015239
jcarrigg@carrigglaw.com
Attorney for Appellants

Other Counsel of Record:

Joseph C. Wilson, IV

P.O. Box 178
Folly Beach, S.C. 29439

John Carrigg
ATTORNEY AT LAW

Phone: (803) 785-5511

120 North Lake Drive
Lexington, South Carolina 29072

Fax: (803) 785-5513

JCARRIGG@CARRIGGLAW.COM

July 16, 2021

VIA Email ONLY: ctappfilings@sccourts.org
The Honorable Jenny A. Kitchings, Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Fred Holland Realty, Inc., and LaJuan Kennedy v. The City of Folly Beach
Civil Action No.: 2020-CP-10-03549
Appellate Case No: 2021-000105

Dear Ms. Kitchings:

Enclosed please find the Motion for Extension of Time to file Proof of Service of Record on Appeal of Appellants Fred Holland Realty, Inc., and LaJuan Kennedy, seeking a thirty (30) day extension. Please return by email a stamped/ filed copy.

By copy of this letter, we are also serving counsel for the Respondent, Joseph Wilson, IV, with this Motion.

Thank you for your consideration in this matter.

With highest regards, I remain

Very truly yours,

s/John Carrigg
John Carrigg

JWC/adr

Enclosure(s)

CC: Joseph Wilson, IV, counsel for Respondent, The City of Folly Beach. Via US Mail and email: jwilson@cityoffollybeach.com