

RECEIVED

Aug 19 2021

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Erin D. Dean, Special Referee

CASE NO.: 2019-CP-07-00818  
APPELLATE TRACKING NO.: 2021-00321

Mare Baracco,.....Appellant,

v.

County of Beaufort,.....Respondent.

MOTION FOR 30-DAY EXTENSION

Appellant moves for a thirty day extension to file her initial brief and designation of contents of record on appeal. This request is due to counsel's heavy workload.

August 19, 2021

Thomas R. Goldstein, S. C. Bar No. 2186  
P. O. Box 71121  
N. Charleston, S. C. 29415-1121  
(843) 554 4291; (843) 554 5566 (fax)  
[tgoldstein@cobblaw.net](mailto:tgoldstein@cobblaw.net)  
Attorneys for Appellant

CERTIFICATE OF COUNSEL

I certify that prior to filing this motion, I consulted with opposing counsel who does not object to the relief requested.

August 19, 2021

Thomas R. Goldstein, S. C. Bar No. 2186

RECEIVED

Aug 19 2021

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Erin D. Dean, Special Circuit Judge

CASE NO.: 2019-CP-07-00818  
APPELLATE TRACKING NO.: 2021-00321

Mare Baracco,.....Appellant,

v.

County of Beaufort,.....Respondent.

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension on the Respondent, Beaufort County by depositing a copy of it in the United States mail, postage prepaid on August 19, 2021, addressed to its attorney of record, E. Richardson LaBruce, Finger, Melnick & Brooks, P.A., P. O. Box 24005, Hilton Head Island, South Carolina 29925-4005 and also by providing a copy by electronic means.

August 19, 2021

Thomas R. Goldstein, S. C. Bar No. 2186  
Belk, Cobb, Infinger & Goldstein, P.A.  
P. O. Box 71121  
N. Charleston, S. C. 29415-1121  
(843) 554 4291; (843) 554 5566 (fax)  
[tgoldstein@cobblaw.net](mailto:tgoldstein@cobblaw.net)  
Attorneys for Appellant

**BELK, COBB, INFINGER AND GOLDSTEIN, P.A.**

Harry C. Belk (1919-2003)  
Dale T. Cobb, Jr.

Peggy M. Infinger  
pinfinger@cobblaw.net

Thomas R. Goldstein  
tgoldstein@cobblaw.net

ATTORNEYS AT LAW  
2344 COSGROVE AVENUE  
CHARLESTON, SC 29405

August 19, 2021

Mailing Address:  
P.O. Box 71121  
Charleston, SC  
zip 29415-1121  
Ph: (843) 554-4291  
Fax: (843) 554-5566

Hon. Jenny A. Kitchings  
Clerk of Court  
S. C. Court of Appeals  
Post Office Box 11629  
Columbia, S C. 29211

**RECEIVED**  
**Aug 19 2021**  
**SC Court of Appeals**

RE: Baracco v. Beaufort County—Appellate Tracking Number 2021-000321  
2019 CP 07 00818

Dear Ms. Allen,

The appellant's initial brief and designation of contents of record on appeal are due tomorrow. I am writing to request a 30-day extension due to a heavy workload. I have consulted with opposing counsel prior to making this request, and he has no objection. I enclose our firm's check in the amount of \$50.00 to cover this request. I also enclose a formal motion since this is my second request for extension. With kind regards, I am

Very truly yours,

TRG/

  
Belk, Cobb, Infinger & Goldstein, P.A.  
Thomas R. Goldstein

Enclosure: Motion for Extension, check No. 19659

cc:  
Richardson LaBruce, Esq. (with enclosure)