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Aug 23 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Honorable Benjamin H. Culbertson, Circuit Court Judge

Civil Action No.: 2018-CP-26-6424
Appellate Case No. 2021-000393

South Carolina Electric & Gas Company, Respondent,

v.

Barbara Todd, Landowner,

and

Public Service Authority; Pitch Landing, LLC; and David O. Heniford, Jr., Other Condemnees,
of which Pitch Landing, LLC is the Appellant.

AND

South Carolina Electric & Gas Company, Respondent,

v.

Pitch Landing, LLC, Appellant,

and

South Carolina Public Authority; Horry Telephone Cooperative; Grand Strand Water and Sewer
Authority; Coastal Carolina National Bank; Billy J. McDowell & Sally R. McDowell; Bobby D.
McDowell, Other Condemnees.

**MOTION FOR EXTENSION TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER OF APPELLANT**

Appellant hereby requests a twenty-one (21) day extension of time to file the Initial Brief and Designation of Matter of Appellant for good cause shown. Opposing counsel has been consulted and does not oppose the motion.

The Initial Brief and Designation of Matter of Appellant are due August 27, 2021 and if this request is granted, the Initial Brief and Designation of Matter of Appellant will be due on September 17, 2021. Appellant submits that this Motion for Extension is not intended for purposes of delay.

Respectfully submitted,

**BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.**

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Myrtle Beach, South Carolina
Dated: August 23, 2021

Other Counsel of Record:

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PROOF OF SERVICE

I certify that I have served the Motion for Extension to File Initial Brief and Designation of Matter of Appellant by depositing a copy of it in the United States mail, postage prepaid, on August 23, 2021, addressed to its attorney of record, Gregory M. Alford, Esq., Alford Law Firm, LLC, Post Office Drawer 8008, Hilton Head Island, SC 29938.

**BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.**

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