

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
CIRCUIT COURT

R. Scott Sprouse, Circuit Court Judge

Appellate Case No. 2021-000285

RECEIVED

AUG 26 2021

SC Court of Appeals

Moats Construction, Inc.....Appellant,

v.

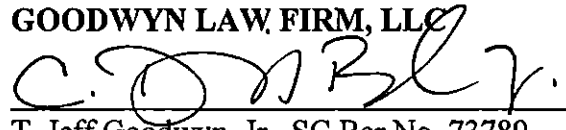
City Council of the County of AndersonRespondent.

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

Appellant, by and through its undersigned attorney hereby moves this Honorable Court for a 30-day extension in which to file his Initial Brief and Designation of Matter to be included in the Record on Appeal. This Motion is made with Respondent's consent. The Initial Brief is currently due on September 1, 2021. If the extension is granted, the Initial Brief will be due on October 1, 2021. This motion is based on the trial schedule of Appellant's counsel as well as planned leave.

Signature next page

GOODWYN LAW FIRM, LLC



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Attorneys for Appellant

Columbia, South Carolina
August 26, 2021

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
CIRCUIT COURT

R. Scott Sprouse, Circuit Court Judge

Case No.: 2020-CP-04-01809

Moats Construction, Inc.....Appellant,

v.

City Council of the City of Anderson.....Respondent.

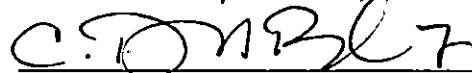
PROOF OF SERVICE

I certify that I have served the **Consent Motion for Extension of Time to File Initial Brief and Designation of Matter** on J. Franklin McClain, Esquire and Stacey T. Coffee, Esquire, Attorneys for the Respondent, at the address below by depositing a copy of same in the United States Mail, postage prepaid, and via email on August 26, 2021.

J. Franklin McClain, Esquire
Office of the City Attorney
401 South Main Street
Anderson, SC 29624
fmcclain@cityofandersonsc.com

Stacey T. Coffee, Esquire
Logan & Jolly, LLP
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August 26, 2021

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August 26, 2021

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SC Court of Appeals

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

RE: *Moats Construction, Inc. v. City Council of the City of Anderson*
Civil Action No.: 2020-CP-04-01809
Appellate Case No.: 2021-000285
Our File No.: 3000-0519

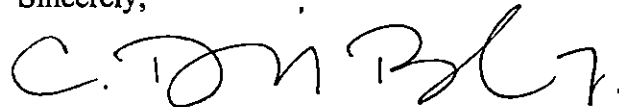
Dear Ms. Kitchings:

Enclosed for filing, please find the original one copy of a Consent Motion for Extension of Time to File Initial Brief and Designation of Matter along with a Proof of Service in regards to the above referenced matter. Please have your office file the original and return the filed, stamped copy to me in the self-addressed stamped envelope provided. Also, enclosed is a check in the amount of \$50.00 representing the filing fees for same.

As evidenced in the Proof of Service, I have served all interested parties, with a copy of this Motion.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



C. David Beale, Jr.

CDB/msb
Enclosures

cc: J. Franklin McClain, Esquire
Stacey T. Coffee, Esquire

Goodwyn Law Firm, LLC
2309 Devine Street
Columbia, S.C. 29205

VIA HAND DELIVERY

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

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