

RECEIVED

Sep 15 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 thirty (30) day extension of time to file the Initial Brief and Designation of Matter of Appellant for good cause shown. The parties are in active settlement discussions and are endeavoring to hold a mediation during the requested extension of time. Opposing counsel has been consulted and does not oppose the motion.

The Initial Brief and Designation of Matter of Appellant are due September 17, 2021 and if this request is granted, the Initial Brief and Designation of Matter of Appellant will be due on October 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.**

s/Robert S. Shelton
Robert S. Shelton, SCB# 68543
Post Office Box 357
Myrtle Beach, SC 29578-0357
(843) 448-2400
rshelton@bellamylaw.com
Attorney for Appellant Pitch Landing, LLC

NEILL LAW FIRM, PA

s/Mark D. Neill
Mark D. Neill, Esq., SCB# 14273
P.O. Box 2810
Murrells Inlet, SC 29576
(843) 651-8580
mneill@neilllawfirm.com
Attorney for Appellant Pitch Landing, LLC

Myrtle Beach, South Carolina
Dated: September 15, 2021

Other Counsel of Record:
Gregory M. Alford, Esq.
Alford Law Firm, LLC
Post Office Drawer 8008
Hilton Head Island, SC 29938
gregg@alfordlawsc.com
843-842-5500

RECEIVED

Sep 15 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.

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 September 15, 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.**

s/Robert S. Shelton

Robert S. Shelton, SCB# 68543

Post Office Box 357

Myrtle Beach, SC 29578-0357

(843) 448-2400

rshelton@bellamylaw.com

Attorney for Appellant Pitch Landing, LLC

NEILL LAW FIRM, PA

s/Mark D. Neill

Mark D. Neill, Esq., SCB# 14273

P.O. Box 2810

Murrells Inlet, SC 29576

(843) 651-8580

mneill@neilllawfirm.com

Attorney for Appellant Pitch Landing, LLC