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Sep 21 2021
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Maite Murphy, Circuit Court Judge

Appellate Case No. 2020-001387
Case No. 2017-CP-10-5493

Shem Creek Development Group, LLC,Respondent,

v.

The Town of Mount Pleasant, South Carolina.....Appellant.

RESPONDENT’S MOTION FOR EXTENSION OF TIME

Pursuant to South Carolina Appellate Court Rules 240 and 263(b), Respondent Shem Creek Development Group, LLC moves for a one-week extension from the existing deadline of September 22, 2021 to file Respondent’s Final Brief in this matter. Respondent’s Final Brief will be due on or before September 29, 2021 if the extension is granted.

Respondent respectfully submits that a one-week extension to file its Final Brief is appropriate due to Appellant serving the amended and corrected Record on Appeal on September 20, 2021, which was only two days before the deadline to file Final Briefs. Respondent’s counsel would like the additional time to review the corrected Record on Appeal for accuracy prior to filing the Final Brief.

Appellant’s counsel consents to the requested extension.

For the reasons set forth herein, Respondent requests a one-week extension to serve and file its Final Brief.

Respectfully submitted,



E. Brandon Gaskins (S.C. Bar No. 73274)
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Attorney for Respondent
Shem Creek Development Group, LLC

September 21, 2021
Charleston, South Carolina

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Shem Creek Development Group, LLC,Respondent,

v.

The Town of Mount Pleasant, South Carolina.....Appellant.

PROOF OF SERVICE

This is to certify that I have this day served counsel for the Appellant in the foregoing matter with a copy of the foregoing **RESPONDENT'S MOTION FOR EXTENSION OF TIME** by electronic mail, addressed as follows:

Andrew F. Lindemann
Lindemann & Davis, P.A.
5 Calendar Court, Suite 202
P.O. Box 6923
Columbia, SC 29260
andrew@ldlwsc.com

and

Claudius O. Tackett, II
Claude Tackett Law Firm, LLC
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Mount Pleasant, SC 29465
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and

David Pagliarini
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*Attorneys for Appellant
Town of Mount Pleasant, South Carolina*



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*Attorney for Respondent
Shem Creek Development Group, LLC*

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VIA EMAIL ONLY

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

E. Brandon Gaskins
Attorney at Law

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Re: Shem Creek Development Group, LLC v. The Town of Mount Pleasant, South Carolina
Appellate Case No.: 2020-001387
Civil Action No.: 2017-CP-10-05493
MVA File No.: 043920.000001

Moore & Van Allen PLLC

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Charleston, SC 29401-1428

Mailing Address:
Post Office Box 22828
Charleston, SC 29413-2828

Dear Ms. Kitchings:

Please find the enclosed **Respondent's Motion for Extension of Time and Proof of Service** for filing in the above matter. The required filing fee in the amount of \$50.00 is being mailed to the Court under separate cover.

By copy of this letter, I am serving Appellant's attorneys with a copy of the Motion for Extension of Time.

Thank you for your assistance with this matter. If you have any questions or concerns, please don't hesitate to contact me.

Sincerely,



E. Brandon Gaskins

EBG/ljp

Enclosure: As stated.

cc: **VIA EMAIL ONLY**
Andrew F. Lindemann, Esquire
David G. Pagliarini, Esquire
Claudius O. Tackett, II, Esquire

Charlotte, NC
Charleston, SC