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Sep 17 2021

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Honorable Deadra L. Jefferson, Circuit Court Judge

Civil Action No: 2018-CP-10-00148
Appellate Case No: 2021-000784

Dewberry 334 Meeting Street, LLC,Appellant,

v.

City of Charleston and City of Charleston Board of Architectural Review- Large,
..... Respondents.

**MOTION FOR SECOND EXTENSION OF TIME TO FILE
APPELLANT’S INITIAL BRIEF AND DESIGNATION OF MATTER**

Appellant, Dewberry 334 Meeting Street, LLC, respectfully requests a second 30-day extension of the deadline for filing and serving the initial appellant’s brief and designation of matter in this case. The current deadline is September 20, 2021. The requested deadline is October 20, 2021.

This extension is requested due to Appellant counsel’s schedule over the last month. Counsel was the lead attorney for a party in an in-person, week-long contested case hearing before the Administrative Law Court in Columbia the week of August 23. The two weeks before the trial were largely spent in trial preparation. Counsel left on a long-standing vacation out of the country on September 1, returning September 12. Upon return Counsel has been engaged in taking depositions and attempting to catch up on matters left in suspense during the trial and vacation.

As a result, counsel has not had the necessary available time to prepare the brief. Counsel will not request any further extensions. Counsel for the Respondent has consented to this Motion.

This Motion is made in good faith and not for the purpose of delay.

Respectfully submitted,

/s/ G. Trenholm Walker

G. Trenholm Walker (SC # 5777)
Walker Gressette Freeman & Linton, LLC
P.O. Box 22167
Charleston, SC 29413
(843) 727-2200
walker@wgflaw.com
Attorneys for Appellant

September 17, 2021
Charleston, South Carolina

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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Appellate Case No: 2021-000784
Civil Action No. 2018-CP-10-000148

Dewberry 334 Meeting Street, LLC Appellant,

v.

City of Charleston and City of Charleston Board of Architectural Review-Large,
..... Respondents.

PROOF OF SERVICE

I certify that I have served the **Appellants Motion for Second Extension of Time to File Initial Brief and Designation of Matter** on City of Charleston and City of Charleston Board of Architectural Review-Large by electronic mail, on September 19, 2021, addressed to their attorney of record, Daniel S. McQueeney, Jr. at mcqueeneyd@charleston-sc.gov.



Vincent Grosso

From: Vincent Grosso
Sent: Friday, September 17, 2021 2:38 PM
To: mcqueeneyd@charleston-sc.gov
Cc: Trenholm Walker; Nancy Jane Dennis
Subject: Motion for Extension of Time to File Appellant's Initial Brief - Dewberry 334 Meeting Street LLC v. City of Charleston et al.
Attachments: 9-17-21 Motion and COS for McQueeney.pdf

Mr. McQueeney,

Please find attached Dewberry's Motion for Extension of Time, as well as Proof of Service.

Thank you,

Vincent Grosso



G. Trenholm Walker
Thomas P. Gressette, Jr.
Ian W. Freeman
John P. Linton, Jr.
Charles P. Summerall, IV
Jennifer S. Ivey
Vincent Joseph-Lee Grosso

G. TRENHOLM WALKER
Direct: 843.727.2208
Email: Walker@WGFLAW.com

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September 17, 2021

ELECTRONIC MAIL and U.S MAIL

The Honorable Jenny Abbott Kitchings
Clerk of the Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings.sccourts@sccourts.org

Re: Dewberry 334 Meeting Street v City of Charleston and City of Charleston Board of Architectural Review-Large
Appellate Case No. 2021-000784
WGFL File 7907.003

Dear Ms. Kitchings:

This firm represents the Appellant, Dewberry 334 Meeting Street, in the above referenced appeal. Appellant's Initial Brief and Designation of Matter are due on September 20, 2021.

Appellant's filing fee of \$25 and Motion for Second Extension of Time to File Appellant's Initial Brief and Designation of Matter is attached. By my calculation, the extended deadline would be October 20, 2021. Opposing counsel have consented to this request.

Your courtesies and consideration of this matter are greatly appreciated.

Sincerely yours,

WALKER GRESSETTE FREEMAN & LINTON, LLC

A handwritten signature in blue ink, appearing to read "Trenholm Walker", written over a horizontal line.

G. Trenholm Walker

Attachment: Motion
Enclosure: Filing Fee

cc: Daniel S. McQueeney, Esq. at mcqueeneyd@charleston-sc.com