

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Perry Gravely, Circuit Court Judge

CIVIL ACTION NOS. 2021-CP-23-01494 &
2021-CP-23-01501

Frances Baty, Helene Lambert, Michael Evatt,
O.D. Strickland, Bonnie Spearman, Allison Morton,
Brian Morton, Janel Lamb, and Henry Lamb..... Appellants,

vs

Greenville County Planning Commission and
Mark III Properties, LLC Respondents.

RESPONDENT GREENVILLE COUNTY
PLANNING COMMISSION'S MOTION FOR
EXTENSION OF TIME
TO FILE INITIAL BRIEF

Respondent Greenville County Planning Commission requests that the Court of Appeals extend the Planning Commission's deadline for filing its Initial Respondent's Brief and Designation of Matter to be Included in the Record on Appeal by 30 days. The Commission makes this request because the Appellants filed and served their initial brief and designations for the record on December 22, 2021, just before the Christmas and New Year's holidays. In addition, during the last weeks of December and the first week of January, the Commission's attorney's office had multiple attorneys out due to illnesses. The combination of the holidays and the

absences caused by these illnesses has left the Commission's attorney with insufficient time in which to complete an initial brief and designations for the record within the 30 days allotted by the Appellate Court Rules.

By our calculations, the original due date for the Planning Commission's initial brief and designations for the record is January 21, 2022. We request that this Court extend the deadline to February 21, 2022.

We have spoken with the attorneys for the Appellants and Co-Respondent Mark III Properties, LLC, and all attorneys have confirmed that their clients consent to this request.

s/Christopher R. Antley
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Attorney for Respondent Greenville County
Planning Commission

Date: January 10, 2022
Greenville, South Carolina

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RESPONDENT GREENVILLE COUNTY
PLANNING COMMISSION'S CERTIFICATE OF
SERVICE

I, Gloria Berry, certify that I served the Appellants with Greenville County Planning Commission's Motion for Extension on January 14, 2022 by emailing a copy to their attorneys of record at *chris@brumbacklangley.com* and *jj@palmettolawfirm.com* and depositing a copy in the United States Mail addressed as follows :

<p>Christopher T. Brumback 531 South Main St., Suite 307 Greenville, SC 29601</p>	<p>J. J. Andrighetti Culbertson Andrighetti, LLC 114 Manly Street Greenville, SC 29601</p>
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s/Christopher R. Antley
Christopher R. Antley, S.C. Bar No. 13631

Date: January 14, 2022
Greenville, South Carolina