

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

Apr 08 2022

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

S.C. SUPREME COURT

Roger M. Young, Circuit Court Judge, Sr.

Appellate Case No. 2022-000020

Braden's Folly, LLC,Respondent,

v.

City of Folly Beach,Appellant.

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S
INITIAL BRIEF AND DESIGNATION OF MATTER

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Respondent, moves this Court for an Order extending the time to file Respondent's Initial Brief and Designation of Matter, which is currently due on Monday, April 17, 2022. The basis for this motion is this matter is a complex regulatory takings case with a large record and numerous legal issues and briefings. This is Respondent's first request for an extension, and Appellant's counsel consents to this request.

WHEREFORE, Respondent's counsel respectfully requests this Court issue its Order granting Respondent a thirty-day extension to May 16, 2022 to file Respondent's Initial Brief and Designation of Matter.

Respectfully submitted,

LEWIS BABCOCK L.L.P.

/s/ Joseph B. Berry

Keith M. Babcock (Bar No. 456)

Joseph B. Berry (Bar No. 101676)

1513 Hampton Street (29201)

Post Office Box 11208

Columbia, South Carolina 29211

Telephone: (803) 771-8000

Facsimile: (803) 733-3534

Email: keith.babcock@lewisbabcock.com

joseph.berry@lewisbabcock.com

Attorneys for Respondent Braden's Folly, LLC

Columbia, South Carolina

April 8, 2022