

THE STATE OF SOUTH CAROLINA
In the South Carolina Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Roger M. Young, Sr., Circuit Court Judge

Case No.: 2021-CP-10-04366

EX PARTE PRESERVATION SOCIETY OF CHARLESTON

Appellant.

SE CALHOUN, LLC,

Respondent,

v.

CITY OF CHARLESTON and CITY OF CHARLESTON
BOARD OF ARCHITECTURAL REVIEW,

Respondents.

**APPELLANT PRESERVATION SOCIETY OF CHARLESTON'S MOTION TO EXTEND
DEADLINE FOR THE SUBMISSION OF APPELLANT'S INITIAL BRIEF
AND DESIGNATION OF MATTER**

COME NOW Appellant Preservation Society of Charleston, and hereby requests an extension of time to file the Appellant's Initial Brief and Designation of Matter in the above-captioned appeal. Appellant's Initial Brief is currently due on Tuesday, April 19, 2022. With the thirty (30) day extension of time requested herein, Appellant's Initial Brief will be due on Thursday, May 19, 2022. As grounds for this Motion, Appellant states as follows:

1. Due to pending obligations relating to other matters, counsel for Appellant anticipates that it will not have sufficient time to prepare and file Appellant's Initial Brief.
2. The deadline for Appellant's Initial Brief has not been previously extended.

Furthermore, counsel for Respondents and counsel for Appellant Historic Charleston Foundation have consented to the extension of time for Appellant to file their Initial Brief.

THEREFORE, Appellant Preservation Society of Charleston respectfully request an extension of time to Thursday, May 19, 2022, for Appellant to file its Initial Brief and Designation of Matter.

s/ Ellis R. Lesemann

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April 15, 2022
Charleston, South Carolina

***Attorneys for Appellant Preservation
Society of Charleston***

CERTIFICATE OF SERVICE

I hereby certify that I have this date, mailed, postage prepaid, a true and correct copy of the **Appellant Preservation Society of Charleston's Motion to Extend Deadline for the Submission of Appellant's Initial Brief and Designation of Matter** to the following counsel of record:

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Apr 15 2022

SC Court of Appeals

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VIA U.S. MAIL AND ELECTRONIC MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court for SC Court of Appeals
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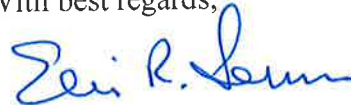
Re: *SE Calhoun, LLC v. City of Charleston and City of Charleston Board of Architectural Review*, Appellate Case No. 2021-001530

Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of Appellant Preservation Society of Charleston's Motion to Extend Deadline for the Submission of Appellant's Initial Brief and Designation of Matter in connection with the above-referenced matter. Also enclosed is this firm's check made payable to the South Carolina Court of Appeals in the amount of Fifty and No/100 Dollars (\$50.00) representing the applicable filing fee.

Thank you for your assistance with this matter.

With best regards,



Ellis R. Lesemann

ERL/agc

Enclosure

cc: John A. Massalon, Esquire (w/ encl.)
Carissa J. Steichen, Esquire (w/ encl.)
Alice F. Paylor, Esquire (w/ encl.)
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