

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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May 24 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 INITIAL REPLY BRIEF

Appellant City of Folly Beach hereby requests a ten (10) day extension of time to file Appellant's Initial Reply Brief and Reply Designation of Matter to be Included in the Record on Appeal. Respondent Braden's Folly, LLC, has consented to this request.

Appellant makes this request due to scheduling issues and other work occupying much of Appellant's counsel Joseph C. Wilson's time the week of May 23, 2022. Further, this matter is a complex regulatory takings matter with a large record and numerous legal issues and briefing.

Respondent's Initial Brief was served on May 18, 2022. As such, Appellant's Initial Reply Brief is currently due on May 31, 2022 (the ten day deadline lands on Saturday, May 28, 2022, and Monday, May 30, 2022 is national holiday). A ten (10) day extension would make Appellant's Initial Reply Brief due on June 7, 2022. This is Appellant's first request for an extension of the deadline for the Initial Reply Brief.

Based on the foregoing, Appellant would respectfully request a ten (10) day extension of time to file Appellant's Initial Reply Brief and any Reply Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

/s/ Joseph C. Wilson, IV
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May 24, 2022