

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No.: 2022-001208
Case No.: 2018-CP-10-03286

Karolina Richardson and Krista Richardson,
Respondents,

v.

Mt. Pleasant Square Associates, II, LLC d/b/a Oyster Park Apartments, Dewberry Capital Corporation, GREP Southeast, LLC,
Appellants.

MOTION FOR EXTENSION OF INITIAL BRIEF

Counsel for Appellants, pursuant to Rule 240, SCACR, moves this Court for an extension of the deadline to file their initial brief and designation of matter due to the fact the trial transcript will not be completed by the 30-day deadline of September 28, 2022. Counsel for Appellants were advised the transcript will be completed 60 days from receipt of the deposit that was received on August 20, 2022. Counsel for Appellants respectfully request an extension of time until November 21, 2022, to file their initial brief and designation of matter.

Counsel for Respondent has consented to the relief requested in this Motion.

September 14, 2022

Signature Page to Follow

ROSS & CRISTALDI, LLC

s/ Emily C. Sheets

Jeffrey A. Ross, Bar No.: 74254

Emily C. Sheets, Bar No.: 78768

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***Attorneys for Appellants, Mt. Pleasant Square
Associates, II, LLC d/b/a Oyster Park Apartments,
Dewberry Capital Corporation, and GREP
Southeast, LLC***

Other Counsel of Record:

Clayton B. McCullough
McCullough Kahn, LLC
329 King Street, Suite 200
Charleston, SC 29401
clay@mklawsc.com

***Attorney for Respondents Karolina Richardson
And Krista Richardson***

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Appellants.

PROOF OF SERVICE MOTION FOR EXTENSION OF INITIAL BRIEF

I certify that I have served the Motion for Extension of Initial Brief and Designation on the following counsel of record using the primary email address listed in the Attorney Information System (if applicable), a copy of the email is attached hereto:

Other Counsel of Record:

Clayton B. McCullough
McCullough Kahn, LLC
329 King Street, Suite 200
Charleston, SC 29401
clay@mklawsc.com
Attorney for Respondents

Motion for Extension of Initial Brief
2018-CP-10-03286

s/ Emily C. Sheets
Jeffrey A. Ross, Bar No.: 74254
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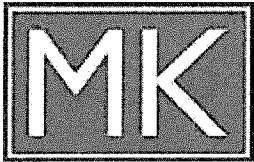
September 14, 2022

Emily Sheets

From: Clayton B. McCullough, Esquire <clay@mklawsc.com>
Sent: Wednesday, September 14, 2022 11:09 AM
To: Emily Sheets
Cc: Jeff Ross; Bobbi Myers; Alicia Terwilliger Ph.D.
Subject: RE: Appeal Extension Richardson v. Dewberry

Categories: Julie not copied, Ben not copied, Kaylee not copied, Katy not copied, Erin not copied, Scott not copied, Phil not copied

sure



Clayton B. McCullough, Esquire
Attorney, McCullough ■ Khan ■ Appel

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From: Emily Sheets <esheets@rclawsc.com>
Sent: Wednesday, September 14, 2022 10:58 AM
To: Clayton B. McCullough, Esquire <clay@mklawsc.com>
Cc: Jeff Ross <jross@rclawsc.com>; Bobbi Myers <bmyers@rclawsc.com>; Alicia Terwilliger Ph.D. <Alicia@mklawsc.com>
Subject: Appeal Extension Richardson v. Dewberry

Good morning, Clay,

I hope all is well. I am writing to get your consent for an extension of time to file the initial brief.

We have been informed that we will have the trial transcript on or before October 15th. We would like to request an extension until November 21st to file the brief. The proposed motion is attached for your review.

Please let me know if you are willing to consent to this extension.

Best Regards,
Emily



Emily C. Sheets
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*Please note our email address change – our entire firm will now be “first initial, last name @rclawsc.com”
Please note our firm address change*

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ROSS & CRISTALDI^{LLC}
ATTORNEYS AT LAW

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Sep 14 2022

SC Court of Appeals

Jeffrey A. Ross
Philip P. Cristaldi, III
Scott H. Winograd
Emily C. Sheets
Benjamin D. Gilchrist

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September 14, 2022

VIA E-MAIL & USPS

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
ctappfillings@sccourts.org

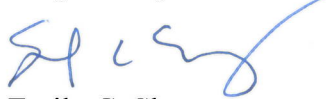
Re: Richardson v. Mt. Pleasant Squares Associates, II, et al.
Appellate Case No.: 2022-001208

Dear Ms. Kitchings:

Enclosed is a Motion for Extension of Time to file the initial brief in this matter along with the filing fee of Fifty and No Dollars (\$50.00). Respondents counsel has consented to this request and that consent is attached to the Motion.

Please do not hesitate to contact me with any questions or concerns.

Respectfully Submitted,



Emily C. Sheets

ECS/bm

Cc: Clayton B. McCullough, Esquire, counsel for the Respondents, (via email only)
Enclosures as stated