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**Oct 21 2022**

**SC Court of Appeals**

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

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas for the Thirteenth Judicial Circuit

The Honorable Charles B. Simmons, Jr. Master-in-Equity

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Civil Action Case Nos.: 2019-CP-23-05954 & 2020-CP-23-04351  
Appellate Case No.: 2022-000897

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Crescent Homes SC, LLC,

Appellant/Plaintiff,

v.

CJN, LLC,

Respondent/Defendant.

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

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COMES NOW Appellant Crescent Homes SC, LLC, 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 Friday, October 21, 2022. With the thirty (30) day extension of time requested herein, Appellant's Initial Brief will be due on Monday, November 21, 2022. As grounds for this Motion, Appellant states as follows:

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. The deadline for Appellant's Initial Brief has not been previously extended.

**THEREFORE**, Appellant Crescent Homes SC, LLC respectfully requests an extension of time to Monday, November 21, 2022, for Appellant to file its Initial Brief and Designation of Matter.

*s/ Ellis R. Lesemann*

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(843) 724-5155

October 21, 2022  
Charleston, South Carolina

*Attorneys for Appellant Crescent Homes  
SC, LLC*

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CERTIFICATE OF SERVICE

I hereby certify that I have this date, mailed, postage prepaid, a true and correct copy of the **Appellant'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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*Attorneys for CJN, LLC*

October 21, 2022  
Charleston, South Carolina

By: \_\_\_\_\_



Ann G. Cunniffe, Paralegal  
LESEMANN & ASSOCIATES, LLC

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**SC Court of Appeals**

**LESEMANN & ASSOCIATES LLC**

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October 21, 2022

**VIA E-FILING**

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Clerk of Court  
SC Court of Appeals  
P.O. Box 11629  
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Re: *Crescent Homes SC, LLC v. CJN, LLC* 2019-CP-23-05954  
*CJN, LLC v. Crescent Homes SC, LLC* 2020-CP-23-4351  
Appellate Case No. 2022-000897

Dear Ms. Kitchings:

Enclosed for filing please find the Appellant's Motion to Extend Deadline for the Submission of Appellant's Initial Brief and Designation of Matter in connection with the above referenced case. 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.

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

With best regards,

*s/ Ellis*

Ellis R. Lesemann

ERL/age

cc: John T. Crawford, Esquire (w/ encl., via email only)  
F. James Warmoth, Esquire (w/ encl., via email only)