

**RECEIVED**

**Dec 14 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

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

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

Crescent Homes SC, LLC.....Appellant,

v.

CJN, LLC.....Respondent.

**RESPONDENT’S MOTION TO EXTEND DEADLINE FOR THE SUBMISSION OF  
RESPONDENT’S INITIAL BRIEF**

COMES NOW Respondent CJN, LLC, and hereby requests an extension of time to file the Respondent’s Initial Brief in the above-captioned appeal. Respondent’s Initial Brief is currently due on Wednesday, December 21, 2022. With the thirty (30) day extension of time requested herein, Respondent’s Initial Brief will be due on Friday, January 20, 2023. As grounds for this Motion, Respondent states as follows:

Due to pending obligations relating to other matters, counsel for Respondent anticipates that it will not have sufficient time to prepare and file Respondent’s Initial Brief. The deadline for Respondent’s Initial Brief has not been previously extended. Counsel for the Appellant has been consulted and consents to the requested extension.

**THEREFORE**, Respondent CJN, LLC respectfully requests an extension of time to Friday, January 20, 2023, for Respondent to file its Initial Brief.

Respectfully,

*s/ F. James Warmoth*

\_\_\_\_\_  
F. James Warmoth, Esquire

(S.C. Bar # 101072)

704 E. McBee Avenue

Greenville, SC 29601

(864) 242-4899

[warmoth@conlaw.com](mailto:warmoth@conlaw.com)

*Attorney for Respondent CJN, LLC*

December 14, 2022

Greenville, South Carolina

RECEIVED

Dec 14 2022

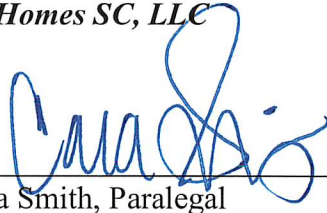
SC Court of Appeals

CERTIFICATE OF SERVICE

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

Ellis R. Lesemann (S.C. Bar No. 15315)  
[erl@lalawsc.com](mailto:erl@lalawsc.com)  
Benjamin H. Joyce (S.C. Bar No. 100949)  
[bhj@lalawsc.com](mailto:bhj@lalawsc.com)  
LESEMANN & ASSOCIATES LLC  
418 King Street, Suite 301  
Charleston, South Carolina 29403  
(843) 724-5155

*Attorneys for Crescent Homes SC, LLC*

By:   
\_\_\_\_\_  
Cara Smith, Paralegal  
Kenison, Dudley & Crawford, LLC

December 14, 2022  
Greenville, South Carolina

Dec 14 2022

SC Court of Appeals

Cara Smith  
Paralegal  
704 East McBee Avenue  
Greenville, SC 29601  
864.242.4899  
smith@conlaw.com

December 14, 2022

**Via Federal Express & Email**

Jenny Abbott Kitchings, Esquire  
Clerk of Court  
SC Court of Appeals  
P.O. Box 161629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Re: *Crescent Homes SC, LLC v. CJN, LLC* 2019-CP-23-05954  
*CJN, LLC v. Crescent Homes SC, LLC* 2020-CP-23-04351  
Appellate Case No. 2022-000897

Dear Ms. Kitchings,

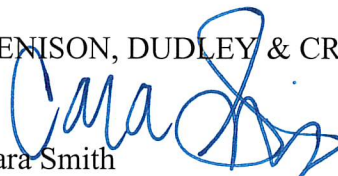
Enclosed for filing please find Respondent's Motion to Extend Deadline for the Submission of Respondent's Initial Brief in connection with the above-referenced case. Also enclosed is this firm's check made payable to the South Carolina Court of Appeals in the amount of Fifty and 00/100 Dollars (\$50.00) representing the applicable filing fee.

Should you have any questions or concerns, please contact our office at 864-242-4899. We greatly appreciate your time and assistance.

With kindest regards,

KENISON, DUDLEY & CRAWFORD, LLC

Cara Smith



Enclosures

cc: Ellis R. Lesemann, Esquire (w/ encl., via email only)  
Benjamin H. Joyce, Esquire (w/ encl., via email only)