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Feb 02 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Daniel Hall, Circuit Court Judge

Case No. 2019-CP-46-00310
Appellate Case No. 2019-000979

Ex Parte, Ryan PowellAppellant,

In re LB PARK, LLC.....Respondent,

v.

San Juan Holdings, Brett Osborne trustee, et al. Respondents.

**MOTION FOR SECOND EXTENSION OF TIME FOR RESPONDENT
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

The Respondent’s initial brief and designation of matter are currently due on February 13, 2023. Due to counsel’s pending workload and court obligations, Respondent respectfully requests a second 30-day extension of time in which to file an initial brief and designation of matter to be included in the record on appeal, which would result in a new deadline of March 15, 2023. Respondent asks that current filing deadlines be stayed pending resolution of this motion.

Respectfully submitted,

s/ Sarah P. Spruill

Sarah P. Spruill, SC Bar # 68337
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P.O. Box 2048 (29602)
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Attorneys for Respondent

February 2, 2023

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Ex Parte, Ryan PowellAppellant,

In re LB PARK, LLCRespondent,

v.

San Juan Holdings, Brett Osborne trustee, et al. Respondents.

PROOF OF SERVICE

I certify that I have served *Motion for Second Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal* on all parties of record by depositing a copy of the same in the United States Mail, postage prepaid, on February 2, 2023, addressed to:

Brett Osborne
San Juan Holdings, Brett Osborne, the trustee
Brett Osborne as Trustee of San Juan Holdings
190 Aviation Lane
Gold Hill, NC 28071

Ryan Powell
c/o 25056 Timberlake Drive
Fort Mill, SC 29708

Stacey Carberry
Stacey Carberry, Legal Assistant
HAYNSWORTH SINKLER BOYD, P.A.
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sspruill@hsblawfirm.com

February 2, 2023

VIA EMAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: *Ex Parte, Ryan Powell, In re LB PARK, LLC v. San Juan Holdings, Brett Osborne trustee, et al.*; C.A. No.: 2019-CP-46-00310
Appellate Case No.: 2019-000979

Dear Ms. Kitchings:

This firm represents the Respondent in the above-captioned matter. Enclosed for filing, please find a Motion for Second Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal, together with our Proof of Service for the same. Also enclosed is our firm's check to cover the cost of the filing fee (w/ mailed copy).

Please note service on counsel of record by copy of this letter. In the meantime, we ask that the current filing deadline be stayed pending resolution of this request. If you have any questions, please give me a call. Thank you for your assistance in this matter. Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



Sarah P. Spruill

SPS/sac

Enclosure

cc: Ryan Powell
Brett Osborne
A. Parker Barnes, III (pbarnes@hsblawfirm.com)
Alexander Mende (amende@hsblawfirm.com)