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May 05 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

THE HONORABLE CHARLES B. SIMMONS, JR., Master in Equity

Appellate Case No. 2022-001578
Circuit Court Case No. 2018-CP-23-03713

Francisco Nicolas Miguel..... Respondent.

v.

Palmetto Asset Investments, LLC, Gabriel Angel Prestegui Gomez and A. Kevin Hunter, II,
Greenville County Tax Collector, Defendants.

of which Palmetto Asset Investments, LLC is the..... Appellant.

RESPONDENT FRANCISCO NICOLAS MIGUEL’S CONSENT MOTION REQUESTING
ADDITIONAL TIME TO FILE INITIAL BRIEF

Respondent Francisco Nicolas Miguel hereby requests that the Court grant a 30-day extension for Respondent to serve and file his Initial Brief, which, upon information and belief, is currently due on May 21, 2023. Counsel for Respondent believes that the extension will neither prejudice the parties nor unduly delay this appeal. Counsel for Respondent is making this request due to just being retained to represent Respondent, which leaves Respondent requiring additional time to fully investigate the matter and file the Respondent’s Initial Brief. Counsel for Respondent has consulted with Counsel for Appellant, and Appellant has offered its consent to this request. If this request is granted, the new deadline would be June 21, 2023. Upon information and belief, Respondent has not received a prior extension.

No memorandum in support of this motion is being filed as it is counsel's belief that such memorandum would not aid the court in ruling on the motion.

s/M. Stokely Holder
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Attorneys for Respondent Francisco Nicolas Miguel

May 5, 2023
Greenville, South Carolina

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CERTIFICATE OF SERVICE

I, the undersigned attorney for the Respondent Francisco Nicolas Miguel, do hereby certify that I have served the Respondent’s Motion for Extension of Time to File Initial Brief on Appellant Palmetto Asset Investments, LLC by sending a copy of it via email, addressed to its attorney of record, Jeffrey T. Spell, jeff@jeffspell.com and to the attorney of record for the defendant, A. Kevin Hunter, III, Christopher Antley, Esq. at CAntley@greenvillecounty.org. I also certify that I have served the Respondent’s Motion for Extension of Time to File Initial Brief on the South Carolina Court of Appeals by depositing a copy of it in the United States Mail, postage prepaid, on May 5, 2023, addressed to The Honorable Jenny Abbott Kitchings, Clerk of Court, P.O. Box 11629, Columbia, SC 29211, and by electronic mail at: ctappfilings@sccourts.org.



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May 5, 2023

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Via U.S. Mail and Email

The Honorable Jenny Abbott Kitchings
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RE: Francisco Nicolas Miguel v. Palmetto Asset Investments, LLC, Gabriel Angel Prestegui Gomez, and A. Kevin Hunter, II, Greenville County Tax Collector
Circuit Court Case No.: 2018-CP-23-03713
Appellate Case No.: 2022-001578

Dear Ms. Kitchings:

Please find enclosed herewith for service upon the court and opposing counsel a Notice of Appearance and Respondent Francisco Nicolas Miguel's Consent Motion Requesting Additional Time to File Initial Brief, along with Certificates of Service for same. I have also included our firm's check in the amount of \$50.00 for the filing fee.

Should you have any questions or concerns, feel free to contact our office.

Regards,



Carolyn Denney
HOLDER PADGETT LITTLEJOHN + PRICKETT, LLC
Paralegal to M. Stokely Holder and Rafor W. Bussey, Jr.

/cgd
Enclosures

cc: Jeffrey T. Spell, Esq.