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May 12 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Bentley D. Price
Circuit Court Judge

Appellate Case No. 2023-000222

James R. Brady, Respondent,

v.

Hilton Head Homes at Allenwood, LLC,
Village Square Development Company LLC,
Lancaster Redevelopment Corp., and Gary L. Grossman,
Appellants.

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Respondent James R. Brady, through his undersigned counsel, respectfully requests a thirty-day (30) day extension of time to file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal. This is Respondent's second request for extension. This extension is requested due to the undersigned's involvement in a pending jury trial that is scheduled to be called in Charleston County, South Carolina, and unavoidable deadlines that have arisen in other cases, including matters currently on appeal to this Court.

Respondent's Initial Brief and Designation of Matter is currently due on May 30, 2023. If

the request is granted, Respondent's new due date would be June 29, 2023. Respondent also respectfully requests that this Court hold all deadlines in abeyance until an order has been issued on this Motion. Respondent does not request this extension for the impermissible purpose of delay.

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esquire (SC Bar No. 101906)

751 Johnnie Dodds Boulevard, Suite 200

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Attorney for Respondent James R. Brady

Mount Pleasant, SC

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Appellants.

PROOF OF SERVICE

I, the undersigned, certify that I have served Respondent James R. Brady's *Motion for Extension of Time* via electronic mail on Counsel for Appellants, George Hamlin O'Kelley, III, Esquire, at his AIS-designated email address (hamlin.okelley@buiستbyars.com) on May 12, 2023.

Pursuant to Rule 262(C)(3), SCACR, and the Order of The Supreme Court of South Carolina, RE: Methods of Electronic Filing Under Rule 262 of the South Carolina Appellate Court Rules (As Amended May 6, 2022), a copy of the aforementioned email correspondence to counsel is attached.

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez, Esquire (SC Bar No. 101906)

751 Johnnie Dodds Boulevard, Suite 200

Mount Pleasant, SC 29464


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(843) 814-8181

Attorney for Respondent James R. Brady

Mount Pleasant, SC

May 12, 2023

From: Jesse Sanchez jesse@jessesanchezlaw.com 
Subject: James R. Brady, Respondent v. Hilton Homes at Allenwood, LLC, et al., Appellant. Appellate Case No. 2023-00022
Date: May 12, 2023 at 11:33 AM
To: hamlin.okelley@buisbyars.com
Cc: Glynn Capell GCapell@capellthomson.com, Charlie Thomson CThomson@capellthomson.com



Good morning, Hamlin,

I have an upcoming jury trial on the roster. Accordingly, for service, please find Respondent's Motion for Extension of Time and corresponding Cover Letter, both of which are being filed momentarily with the Court via OneDrive Electronic Submission.

Thank you,

Jesse

--

PLEASE NOTE WE HAVE A NEW ADDRESS:

Jesse Sanchez
The Law Office of Jesse Sanchez, LLC
751 Johnnie Dodds Blvd., Suite 200
Mount Pleasant, SC 29464
Office: (843) 804-4753
Direct: (843) 814-8181
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May 12, 2023

VIA ONEDRIVE ELECTRONIC SUBMISSION
AND FIRST-CLASS MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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May 12 2023

SC Court of Appeals

RE: James R. Brady, Respondent v. Hilton Homes at Allenwood, LLC, et al.,
Appellant. Appellate Case No. 2023-00022

Dear Ms. Kitchings:

Enclosed for filing, please find the following:

1. Respondent James R. Brady's *Motion for Extension of Time* to file Respondent's Initial Brief and Designation of Matter;
2. Proof of Service.

A check for the fifty dollar (\$50.00) filing fee has been deposited in today's mail. Thank you for your time and attention to this matter. Please do not hesitate to contact me if you have any questions about this filing.

Sincerely,

s/Jesse Sanchez
Jesse Sanchez (SC Bar No. 101906)

Attorney for Respondent James R. Brady

Cc: Glynn L. Capell, Esq. (Via Email Only)
Charles W. Thomson, Esq. (Via Email Only)
George Hamlin O'Kelley, III, Esq. (Via Email Only)

THE LAW OFFICE OF JESSE SANCHEZ, LLC

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