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**Jun 29 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

The Honorable Bentley D. Price  
Circuit Court Judge

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Appellate Case No. 2023-000222

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James R. Brady,

Respondent,

v.

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

Appellants.

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**MOTION FOR EXTENSION OF TIME**

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Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Respondent James R. Brady, through his undersigned counsel, respectfully requests a five (5) day extension of time to file Respondent's Initial Reply Brief and Designation of Matter. This extension is requested for good cause, namely conflicts that have arisen with deadlines in other cases on appeal, including, *Turisk v. Schimpf*, Appellate Case No. 2023-00029, Reply currently due on July 6, 2023, and *Whitfield v. Swanson*, Appellate Case No. 2022-001495, Certiorari granted, Petitioner's brief and Appendix due July 10, 2023. Additionally, the undersigned had a statutory deadline in an appeal from Probate Court in Georgetown County on June 12, 2023, which could not be extended and necessitated his

time, *IN THE MATTER OF: THE ESTATE OF MARY HELEN HARDWICK*, Case No. 2023-CP-22-00161. Finally, the undersigned was informed of entry of an order on June 27, 2023, which necessitated the immediate preparation and filing of a Notice of Appeal and Emergency *Petition for Supersedeas* in *Megan Scott v. Estate of Jonathan Bruner*, Appellate Case No. 2023-001043.


Respondent's Initial Brief and Designation of Matter is currently due on Thursday, June 29, 2023. If the request is granted, Respondent's new due date would be Monday, June 3, 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  
Mount Pleasant, SC 29464  
jesse@jessesanchezlaw.com  
(843) 814-8181

**Attorney for Respondent James R. Brady**

Mount Pleasant, SC  
June 29, 2023

**From:** Hamlin O'Kelley hamlin.okelley@buistbyars.com   
**Subject:** RE: James R. Brady v. Hilton Head Homes at Allenwood, LLC 2023-000222 External  
**Date:** June 29, 2023 at 12:29 PM  
**To:** Jesse Sanchez jesse@jessesanchezlaw.com  
**Cc:** Glynn Capell GCapell@capellthomson.com, Charlie Thomson CThomson@capellthomson.com

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Jesse:

You of course have my consent. If you need another 30 days, you can have it.

I have NO objections

**G. Hamlin O'Kelley, III**  
Attorney at Law  
Buist Byars & Taylor, LLC  
652 Coleman Blvd., Ste 200  
Mt. Pleasant, SC 29464  
Email: [Hamlin.okelley@buistbyars.com](mailto:Hamlin.okelley@buistbyars.com)  
Direct Line: 843.284.1408  
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**From:** Jesse Sanchez <jesse@jessesanchezlaw.com>  
**Sent:** Thursday, June 29, 2023 12:22 PM  
**To:** Hamlin O'Kelley <hamlin.okelley@buistbyars.com>  
**Cc:** Glynn Capell <GCapell@capellthomson.com>; Charlie Thomson <CThomson@capellthomson.com>  
**Subject:** James R. Brady v. Hilton Head Homes at Allenwood, LLC 2023-000222 External

Hamlin,

I had an order come down in one of my cases on Tuesday afternoon requiring an Emergency Petition of Supersedeas, which took up a considerable amount of my time. I am asking the Court to allow me until Monday, five days from today, to file Respondent's Return and Designation of Matter. A copy of the Motion for Extension of Time and cover letter being filed with the South Carolina Court of Appeals via OneDrive electronic submission is attached.

Best Regards,

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  
Fax: (843) 284-3953  
[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)

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Appellants.

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**PROOF OF SERVICE**

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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 June 29, 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

jesse@jessesanchezlaw.com


(843) 814-8181

**Attorney for Respondent James R. Brady**

Mount Pleasant, SC

June 29, 2023



**From:** Jesse Sanchez [jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)   
**Subject:** James R. Brady v. Hilton Head Homes at Allenwood, LLC 2023-000222 External  
**Date:** June 29, 2023 at 12:21 PM  
**To:** Hamlin O'Kelley [hamlin.okelley@buistbyars.com](mailto:hamlin.okelley@buistbyars.com)  
**Cc:** Glynn Capell [GCapell@capellthomson.com](mailto:GCapell@capellthomson.com), Charlie Thomson [CThomson@capellthomson.com](mailto:CThomson@capellthomson.com)

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Best Regards,

Jesse

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[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)

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Brady...23.pdf    Brady...23.pdf



June 29, 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

**RECEIVED**  
**Jun 29 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, requesting a five (5) day extension of time.
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)