

09284

RECEIVED

JUL 06 2023

SC Court of Appeals

**STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS**

**Appeal from the Court of Common Pleas
For Berkeley County
Honorable Dale E. Van Slambrook, Master-in-Equity
Civil Action No.: 2018-CP-08-344
Appellate Case No.: 2023-000405**

BCE 2015, LLC

Appellant,

v.

**YVONNE C. KNIGHT and
ELEANOR C. BROWN,**

Respondents.

**MOTION FOR ADDITIONAL EXTENSION OF TIME TO FILE
RESPONDENTS' INITIAL BRIEF AND DESIGNATION OF MATTERS
TO BE INCLUDED IN RECORD ON APPEAL**

H. Ronald Stanley, Esquire (S.C. Bar No. 5304)
THE STANLEY LAW GROUP, P.A.
1418 Park Street
Post Office Box 7722
Columbia, South Carolina 29202
(803) 799-4700
E-Mail: hrstanley@stanleylawsc.com
ATTORNEYS FOR RESPONDENTS

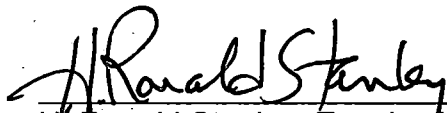
July 6, 2023

TO: THE SOUTH CAROLINA COURT OF APPEALS:

The Respondents, Yvonne C. Knight and Eleanor C. Brown, hereby respectfully request that this honorable court grant the Respondents an additional thirty (30) day extension of time to file and serve Respondents' Initial Brief and Designation of Matters to be Included in the Record on Appeal. Respondents' Initial Brief and Designation of Matters is due by July 13, 2023. Respondents' counsel has not been able to complete his work on the Initial Brief and Designation of Matters as of the date of this Motion due to his workload and he is scheduled to be out of his office for a previously scheduled family vacation with his grandchildren from July 7, 2023 through July 15, 2023. Respondents' counsel needs additional time to complete Respondents' Initial Brief and Designation of Matters. Respondents respectfully request that the time be extended to August 14, 2023.

Respectfully Submitted

THE STANLEY LAW GROUP, P.A.



H. Ronald Stanley, Esquire (S.C. Bar No.5304)
THE STANLEY LAW GROUP, P.A.
1418 Park Street
Post Office Box 7722
Columbia, South Carolina 29202
(803) 799-4700
E-Mail: hrstanley@stanleylawsc.com
ATTORNEYS FOR RESPONDENTS

Columbia, South Carolina

Dated: July 6, 2023

OTHER COUNSEL OF RECORD

Stephen P. Groves, Sr., Esquire
S.C. Bar No.: 007854
BUTLER SNOW LLP
25 Calhoun Street, Suite 250
Charleston, South Carolina 29401
(843) 277-3704
Email: stephen.groves@butlersnow.com

John J. Dodds, III, Esquire
S.C. Bar No.: 001707
CISA & DODDS
858 Lowcountry Boulevard, Suite 101
Mount Pleasant, South Carolina 29464
(843) 881-6530
Email: john@cisadodds.com

ATTORNEYS FOR APPELLANT

STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS

RECEIVED

JUL 06 2023

SC Court of Appeals

Appeal from the Court of Common Pleas
For Berkeley County
Honorable Dale E. Van Slambrook, Master-in-Equity
Civil Action No.: 2018-CP-08-344

BCE 2015, LLC

Appellant,

v.

YVONNE C. KNIGHT and
ELEANOR C. BROWN,

Respondents.

PROOF OF SERVICE
for the
MOTION FOR ADDITIONAL EXTENSION OF TIME TO FILE
RESPONDENTS' INITIAL BRIEF AND DESIGNATION OF MATTERS
TO BE INCLUDED IN RECORD ON APPEAL

H. Ronald Stanley, Esquire (S.C. Bar No. 5304)
THE STANLEY LAW GROUP, P.A.
1418 Park Street
Post Office Box 7722
Columbia, South Carolina 29202
(803) 799-4700
E-Mail: hrstanley@stanleylawsc.com
ATTORNEYS FOR RESPONDENTS

July 6, 2023

I, H. Ronald Stanley, Esquire, hereby certify that on 6 July, 2023, I served a copy of the **MOTION FOR ADDITIONAL EXTENSION OF TIME TO FILE RESPONDENTS' INITIAL BRIEF AND DESIGNATION OF MATTERS TO BE INCLUDED IN RECORD ON APPEAL** submitted by the Respondents, Yvonne C. Knight and Eleanor C. Brown, on counsel for the Appellant, via e-mail at the addresses noted:

Stephen P. Groves, Sr., Esquire
S.C. Bar No.: 007854
BUTLER SNOW LLP
25 Calhoun Street, Suite 250
Charleston, South Carolina 29401
(843) 277-3704
Email: stephen.groves@butlersnow.com

John J. Dodds, III, Esquire
S.C. Bar No.: 001707
CISA & DODDS
858 Lowcountry Boulevard, Suite 101
Mount Pleasant, South Carolina 29464
(843) 881-6530
Email: john@cisadodds.com
ATTORNEYS FOR APPELLANT

Signed: 
H. Ronald Stanley

Columbia, South Carolina

Dated: July 6, 2023