

**RECEIVED**

**Aug 11 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals  

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

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

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

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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.

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

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Respondent Francisco Nicolas Miguel hereby requests that the Court grant a 15-day extension for Respondent to serve and file his Final Brief, which, upon information and belief, is currently due on August 11, 2023. Counsel for Respondent believes that the extension will neither prejudice the parties nor unduly delay this appeal. 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 August 25, 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

M. Stokely Holder (SC Bar #73892)

Raford W. Bussey, Jr. (SC Bar #103943)

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*Attorneys for Respondent Francisco Nicolas Miguel*

August 11, 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 Final 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](mailto:jeff@jeffspell.com) and to the attorney of record for the defendant, A. Kevin Hunter, III, Christopher Antley, Esq. at [CAntley@greenvillecounty.org](mailto:CAntley@greenvillecounty.org). I also certify that I have served the Respondent’s Motion for Extension of Time to File Final Brief on the South Carolina Court of Appeals by depositing a copy of it in the United States Mail, postage prepaid, on August 11, 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](mailto:ctappfilings@sccourts.org).



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August 11, 2023

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August 11, 2023

**Via U.S. Mail and Email**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
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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 Respondent Francisco Nicolas Miguel's Consent Motion Requesting Additional Time to File Final 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 Raford W. Bussey, Jr.

/cgd  
Enclosures

cc: Jeffrey T. Spell, Esq.