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Feb 05 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM HORRY COUNTY

COURT OF COMMON PLEAS

Daniel John MacDonald Sr., Special Referee Horry County

Appellate Case No. 2023-001920

RHH Land Investors, LLC.....Respondent

v.

Leonard R. Watts.....Appellant

**MOTION FOR EXTENSION OF TIME FOR APPELLANT TO SERVE AND FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 240, SCACR, appellant Leonard R. Watts, by and through his undersigned counsel, hereby moves for an extension of time in which to serve and file Appellant’s Initial Brief and Designation of Matter to be included in the Record on Appeal (“Designation of Matter”). Mr. Watts requests an extension of twenty (20) days to file the Initial Brief and Designation of Matter which are currently due on February 5, 2024. This is the first request for an extension filed by Mr. Watts.

The grounds for this motion are that other impending professional matters and obligations have created a need for additional time to prepare the Initial Brief and Designation of Matter. It is our belief that a twenty (20) day delay will not prejudice the rights of any of the parties. Granting this motion would require the Initial Brief and Designation of Matter to be filed with the Court no later than Monday, February 26, 2024.

For the foregoing reasons, Mr. Watts requests an extension of the deadline for filing and serving the Initial Brief and Designation of Matter until February 26, 2024.

Dated this 5<sup>th</sup> day of February, 2024.

Biddle Law Firm, LLC

/s/ James Marshall Biddle

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Conway, South Carolina  
February 5, 2024

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RHH Land Investors, LLC.....Respondent

v.

Leonard R. Watts.....Appellant

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time for Appellant to Serve and File Initial Brief and Designation of Matter to Be Included in the Record on Appeal to the following counsel of record by depositing a copy of it in the United States Mail, postage prepaid on February 5, 2024 and addressed as follows:

Aaron J. Angell, Esquire  
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Attorney for Appellant Leonard Ray Watts

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February 5, 2024

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**SC Court of Appeals**

February 5, 2024

**VIA EMAIL & US MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Re: RHH Land Investors, LLC v. Leonard R. Watts, et al.  
Appellate Case No. 2023-001920

Dear Ms. Kitchings:

Regarding the above-referenced matter, enclosed please find a Motion for Extension of Time for Appellant to Serve and File Initial Brief and Designation of Matter to be Included in the Record on Appeal, Proof of Service, and my firm's check in the amount of \$50.00 for the filing fee.

Should you have any questions or need any additional information regarding the enclosed, please do not hesitate to contact me. Thank you for your assistance with this matter.

Yours very truly,  
**Biddle Law Firm, LLC**

*James Marshall Biddle*

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James Marshall Biddle

cc: Aaron J. Angell, Esquire  
Kevin N. Molony, Esquire  
Jonathan D. Waller, Esquire  
Aaron E. Edwards, Esquire