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Mar 15 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Derham Cole, Circuit Court Judge

Appellate Case No. 2023-001529
Trial Court Case No. 2020-CP-23-02297

Zachary Leland Moody and Kristina L. Moody,.....Appellants,

v.

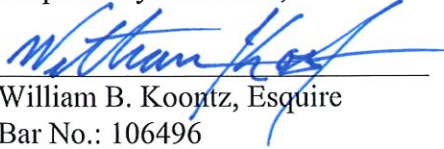
Gabriela B. Lopez a/k/a Gabriela Baltazar Lopez-Guiterrez, an individual,
Leopoldo Vera Hernandez, an individual, Santa Fe Construction, LLC, Juan
Carlos Maldonado, an individual, ServPro of Pickens County d/b/a Blue Moon
Enterprises, Inc., Scott D. Caufield, an individual, Keller Williams Western
Upstate, The Haro Group of Keller Williams, Creasy Construction, LLC, Harry
James Creasy, an individual, and John Allen Drew, an individual,.....Defendants

of which ServPro of Pickens County d/b/a Blue Moon Enterprises, Inc. and TCT1,
LLC d/b/a Keller Williams Western Upstate., are the..... Respondents.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL RESPONDENTS' BRIEF

Pursuant to Rule 240, SCACR, the Respondent, TCT1, LLC d/b/a Keller Williams Western Upstate, requests a 30-day extension of the deadline for filing their initial Respondent's brief to be included in the record of this appeal. The current deadline is March 22, 2024. This is the first request for an extension of this deadline. Counsel for the Appellants and for Respondent ServPro have consented to this request.

Respectfully submitted,



William B. Koontz, Esquire

Bar No.: 106496

Bluestein Thompson Sullivan, LLC

P.O. Box 7965

Columbia, SC 29202

(803) 779-7599

William@bluesteinattorneys.com

Attorney for Respondent TCT1, LLC

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v.

Gabriela B. Lopez a/k/a Gabriela Baltazar Lopez-Guiterrez, an individual, Leopoldo Vera Hernandez, an individual, Santa Fe Construction, LLC, Juan Carlos Maldonado, an individual, ServPro of Pickens County d/b/a Blue Moon Enterprises, Inc., Scott D. Caufield, an individual, Keller Williams Western Upstate, The Haro Group of Keller Williams, Creasy Construction, LLC, Harry James Creasy, an individual, and John Allen Drew, an individual,.....Defendants

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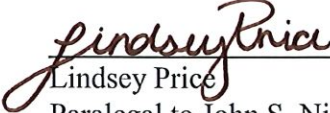
PROOF OF SERVICE

I certify that I have served a copy of the *Motion for Extension of Time* on counsel for the Appellants and counsel for Respondent ServPro as indicated herein below, by emailing a copy of the same on March 15, 2024, by address as follows:

Townes B. Johnson, III
tjohnson@sc.legal
Townes B. Johnson III, LLC
Greenville, SC

Allen L. DuPre
ald@lylesfirm.com
Lyles & Associates, LLC
Mt. Pleasant, SC

March 15, 2024



Lindsey Price
Paralegal to John S. Nichols & William B. Koontz

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VIA HAND DELIVERY

The Hon. Jenny A. Kitchings
Clerk of the Court of Appeals
Court of Appeals of South Carolina
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

RE: Zachary Leland Moody and Kristina L. Moody v. Gabriela B. Lopez et al.
Appellate Case No.: 2023-001529

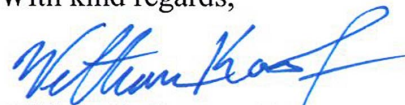
Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of a Motion for Extension of Time to File Initial Respondents' Brief in this case. I have also enclosed the following:

- 1.) A filing fee of \$50.00;
- 2.) Proof of Service of the Motion on counsel of record.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

With kind regards,



William B. Koontz, Esq.

WBK/lap

Enclosures as Stated

cc: John S. Nichols, Esq. (john@bluesteinattorneys.com)
Daniel Draisen, Esq. (daniel@injuredsc.com)
Allen Leland DuPre, Esq. (ald@lylesfirm.com)
Townes B. Johnson, III, Esq. (tjohnson@sc.legal)