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**Apr 22 2024**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Derham Cole, Circuit Court Judge

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

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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.

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**MOTION FOR EXTENSION OF TIME TO FILE INITIAL RESPONDENTS' BRIEF**

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Pursuant to Rule 240, SCACR, the Respondent, TCT1, LLC d/b/a Keller Williams Western Upstate, requests a 15-day extension of the deadline for filing their initial Respondent's brief to be included in the record of this appeal. Counsel for the Respondent is requesting this extension due to an unexpected medical issue. The current deadline is April 22, 2024. This is the second request for an extension of this deadline.

Respectfully submitted,



William B. Koontz, Esquire

Bar No.: 106496

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Attorney for Respondent TCT1, LLC

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**PROOF OF SERVICE**

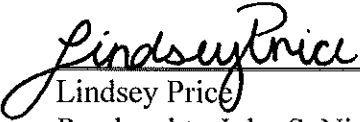
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I certify that I have served a copy of the *Motion for Extension of Time* on counsel for the Appellants and counsel for Respondent ServPro as indicated herein below, by emailing a copy of the same on April 22, 2024, by address as follows:

Townes B. Johnson, III  
[tjohnson@sc.legal](mailto:tjohnson@sc.legal)  
Townes B. Johnson III, LLC  
Greenville, SC

Allen L. DuPre  
[ald@lylesfirm.com](mailto:ald@lylesfirm.com)  
Lyles & Associates, LLC  
Mt. Pleasant, SC

April 22, 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](mailto: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](mailto:john@bluesteinattorneys.com))

Daniel Draisen, Esq. ([daniel@injuredsc.com](mailto:daniel@injuredsc.com))

Allen Leland DuPre, Esq. ([ald@lylesfirm.com](mailto:ald@lylesfirm.com))

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