

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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SC Court of Appeals

69444

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge
The Honorable Alexander S. Macaulay, Circuit Court Judge

Case No.: 2005-CP-37-00788
Appellate Case No.: 2011-202946

Tri-County Development, et. al.
Jeff Gray and Melinda Holbrooks Respondents,

v.

Christopher A. Pierce Appellant.

RESPONDENTS' MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF and DESIGNATION OF MATTER

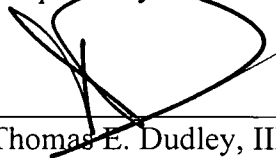
Pursuant to Rule 240, SCACR, Respondents, Tri-County Development, Inc., Melinda Holbrooks, and Jeff Gray (collectively "Respondents"), hereby request that the Court grant Respondents a ten (10) day extension in which to file their Initial Brief and Designation of Matter in the above captioned matter. Currently, Respondents' Initial Brief is due on or before August 14, 2013. Counsel for Respondents has ^{obtained (FE-D)} requested the consent of counsel for Appellant as to this motion, ~~but has not heard back as to whether or not he will consent.~~ ^(TEB) Counsel for Respondents believes that the requested extension will neither prejudice the parties nor unduly delay this appeal. Counsel for Respondents is making this request because counsel for Respondents had a 1/2 day trial on August 12, 2013, and has depositions scheduled for August

13, August 20 and August 21 (which will be held in Atlanta, GA for two (2) expert witnesses).

It is further requested that all time be held in abeyance during the pendency of this motion.

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.

Respectfully submitted,



Thomas E. Dudley, III (SC Bar # 66154)
Kenison, Dudley & Crawford, LLC
704 East McBee Avenue
Greenville, SC 29601
(864) 242-4988

Attorney for Respondents

August 13, 2013
Greenville, SC

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM OCONEE COUNTY
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The Honorable R. Lawton McIntosh, Circuit Court Judge
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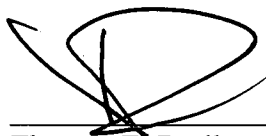
v.

Christopher A. Pierce Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that a true copy of the Respondents' Motion for Extension of Time to File its Initial Brief and Designation of Matter in the above-referenced case has been served on all parties of record by mailing a copy of same in the United States mail, postage prepaid this 17 day of August, 2013, addressed as follows:

T. Jeff Goodwyn, Jr.
Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
Columbia, SC 29205
Attorney for Appellant



Thomas E. Dudley, III (SC Bar # 66154)
Kenison, Dudley & Crawford, LLC
704 East McBee Avenue
Greenville, SC 29601
PH: (864) 242-4988
FAX: (864) 242-4844
Attorney for Respondents

KENISON, DUDLEY & CRAWFORD, LLC

A T T O R N E Y S A T L A W

KEVEN K. KENISON
(1964-2013)

THOMAS E. DUDLEY, III
Practicing Attorney in South Carolina and North Carolina

JOHN T. CRAWFORD, JR.
Practicing Attorney in South Carolina

M. STOKELY HOLDER
Practicing Attorney in South Carolina

TOWNES B. JOHNSON, III
Practicing Attorney in South Carolina

F. LEE PRICKETT, III
Practicing Attorney in South Carolina

August 13, 2013

Hon. Jenny Abbott Kitchings
Clerk of Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Tri-County Development, et al. v. Christopher A. Pierce
 Appeal from Oconee County
 Case No.: 2005-CP-37-00788
 Appellate Case No.: 2011-202946


To Whom It May Concern:

Please find enclosed an original and six (6) copies of Respondents' Motion to Extend the Time to File its Initial Brief and Designation of Matter with Certificate of Service in the above referenced matter, as well as our check in the sum of \$25.00 as and for the filing fee.

Thank you for your assistance in this matter and please do not hesitate to contact our office if you have any questions.

Very truly yours,

KENISON, DUDLEY & CRAWFORD, LLC


Helen Cotrone
Legal Assistant

Enclosures
cc: T. Jeff Goodwyn, Jr.
 Jeff Gray

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AUG 16 2013

COURT of Appeals

GREENVILLE
704 East McBee Avenue Greenville, South Carolina 29601
Phone 864.242.4899 Fax 864.242.4844

CHARLESTON
534 B Oristo Ridge Edisto Beach, South Carolina 29438
Phone 843.869.1000

ATLANTA
1130 Hurricane Shoals Road Suite 600 Lawrenceville, Georgia 30043
Phone 770.513.6400 Fax 770.518.6577