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May 28 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Hon. R. Ferrell Cothran, Jr., Circuit Court Judge

Case No. 2023-CP-26-02475
Ct. App. No. 2024-000440

Nicholas F. Wilson,

Appellant,

v.

Janet P. Gochenour; Janet P. Gochenour Trustee; James B. Parker, Sr.; Mary Ann Parker; Kenneth Gregory Moore; R&G Corp. d/b/a Century 21 The Harrelson Group; Patton Development SC, LLC; Flagstar Bank, N.A.; Sonia M. Raymond; Raymond Law Firm, P.A,

Respondents.

**RESPONDENTS SONIA M. RAYMOND AND THE RAYMOND LAW FIRM'S
CONSENT MOTION FOR AN EXTENSION OF TIME TO FILE ITS INITIAL BRIEF
AND DESIGNATION OF MATTER**

Respondents Sonia M. Raymond and Raymond Law Firm, P.A., pursuant to Rule 240, SCACR, respectfully move for a 30-day extension of time in which to file their initial brief and designation of matter to the record on appeal. In support of this motion, Respondents would show as follows:

1. Appellant filed and served his initial brief on May 22, 2024. An extension for serving and filing the Appellant's initial brief and designation of matter was requested

on May 3, 2024 by Appellant. The Court granted Appellant an extension until May 22, 2024.

2. Based on the filing of the Appellant's initial brief and designation, Respondents' initial brief and designation are now due June 21, 2024. Counsel requests an extension of this deadline to give counsel sufficient time to become familiar with the record and to accommodate deadlines in other matters. Undersigned counsel certifies that this extension is sought in good faith and not for purposes of delay.

3. Respondents request an extension of 30 days, which would create a new deadline of July 22, 2024 for Respondents to file their initial brief and designation of matter.

4. Counsel for Respondents Sonia M. Raymond and Raymond Law Firm, P.A. have conferred with Appellant's counsel regarding this extension request, and they consent to the extension. The remaining Respondents were not contacted for their consent.

Respectfully submitted,

s/Bruce Wallace

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*Attorneys for Respondents Sonia M. Raymond and
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PROOF OF SERVICE

I certify that I have served the foregoing Motion for Extension of Time to File Respondents Initial Brief and Designation of Matter on the following counsel of record using the primary email address listed in the Attorney Information System and via US mail.

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