

RECEIVED

Jun 06 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM YORK COUNTY  
Court of Common Pleas

The Honorable Teasa K. Weaver  
Master-in-Equity

---

Case No. 2019-CP46-1893

---

John Godbold,

Appellant,

vs.

Haas Consulting, LLC, Beverly Osborne, individually and on behalf of Waterstone Development, LLC, Storage Solutions, LLC, Crystal Homes, Inc., Coastal Palm Properties, LLC, and Signature Pointe Properties, LLC; James C. Melchers, as Personal Representative of the Estate of William Phillip Murdock, Sr., and Tiffany Marie Melchers, as Personal Representative of the Estate of William Phillip Murdock, Sr.,

Respondents.

---

MOTION FOR EXTENSION OF TIME AND PROOF OF SERVICE

---

The Appellant's Attorney requests this Court to grant him a 60-day extension of time to file a Appellant's Initial Brief. Appellant's Attorney has not had sufficient time to complete the Appellant's Initial Brief and Matters to be included in the record on appeal in the time period and requests an extension. Appellant's Attorney had two other briefs due within this time frame as well. Further, the transcripts for this trial are very voluminous (thousands of pages). This is the second extension requested.

June 6, 2024

/s/ Daniel D. D'Agostino

Daniel D. D'Agostino

S.C. Bar No.: 65088

D'AGOSTINO LAW FIRM

25 West Liberty Street

York, South Carolina 29745

dan@ddllplaw.com  
Office: 803-628-6509  
**ATTORNEY FOR APPELLANT**

I certify that I have served this Motion for Extension of Time on the following attorneys at the following email address on this 6<sup>th</sup> day of June, 2024:

Thomas E. Lydon  
[tlydon@mgclaw.com](mailto:tlydon@mgclaw.com)  
Attorney for Haas Consulting, LLC

Aaron J. Hayes  
Kenneth B. Wingate  
Matthew J. Myers  
[ajh@swblaw.com](mailto:ajh@swblaw.com)  
[kbw@swblaw.com](mailto:kbw@swblaw.com)  
[mjm@swblaw.com](mailto:mjm@swblaw.com)

Attorneys for Tiffany Melchers and James Melchers, as Personal Representatives of the Estate of William Phillip Murdock, Sr.

Beverly Osborne, Pro Se  
314 Challis Court  
Rock Hill, SC 29732

June 6, 2024

/s/ Daniel D. D'Agostino  
Daniel D. D'Agostino  
S.C. Bar No.: 65088  
D'AGOSTINO LAW FIRM  
25 West Liberty Street  
York, South Carolina 29745  
dan@ddllplaw.com  
Office: 803-628-6509  
**ATTORNEY FOR APPELLANT**

**RECEIVED**  
**Jun 06 2024**  
**SC Court of Appeals**