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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2024-000772

Waterfall Investment and Construction Group, LLC, *Appellant,*

v.

A&E Construction & Maintenance, LLC, Jeronimo Ponce d/b/a JP & Sons Builders, Creative
Drafting and Designs, Defendants,


of which Jeronimo Ponce d/b/a JP & Sons Builders is the*Respondents.*

**APPELLANT’S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, Appellant Waterfall Investment and Construction Group, LLC hereby moves for a thirty (30) day extension of time to file and serve its Initial Brief and Designation of Matter. Appellant files this motion seeking an extension of time due to its primary counsel in this matter having to care for an immediate family member who just had surgery, along with multiple other procedures. Appellant’s counsel will have to reassign another attorney to prepare the Initial Brief and Designation of Matter while she is on leave.

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Respectfully submitted,


**WRIGHT, WORLEY, POPE,
EKSTER & MOSS, PLLC**
Kenneth R. Moss, SC Bar No. 15520
Brittany C. Moore, SC Bar No. 102780
628A Sea Mountain Highway
North Myrtle Beach, SC
Tel: (843) 281-9901 / Fax: (843) 281-9903
Email: KennethMoss@wwpemlaw.com
BrittanyMoore@wwpemlaw.com

North Myrtle Beach, SC

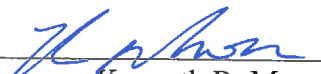
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PROOF OF SERVICE

I certify that I have served a copy of the foregoing *Appellant's Motion for Extension of Time to File Initial Brief and Designation of Matter* in the above-captioned matter on the following individuals by electronic mail, addressed as follows:

Brandon T. Reeser, Esq. (BReeser@WilsonHeyward.com)
Wilson, Heyward & Reeser
924 Folly Road
P.O. Box 13177
Charleston, SC 29422
Counsel for Respondent


Kenneth R. Moss

Dated: June 18, 2024

WRIGHT, WORLEY, POPE, EKSTER & MOSS, PLLC

ATTORNEYS AT LAW

628A SEA MOUNTAIN HWY

NORTH MYRTLE BEACH, SOUTH CAROLINA 29582

Telephone (843) 281-9901 - Fax (843) 281-9903

O. RICHARD WRIGHT, JR.
DENNIS T. WORLEY*
HAROLD G. "BUTCH" POPE
PAUL J. EKSTER*
KENNETH R. MOSS*
NAPOLEON B. BAREFOOT, JR.
BOYD T. WORLEY
CHRISTOPHER C. RUSSELL
BRITTANY C. MOORE*
DAVID H. COOLEY*
GEORGE N. SPIRAKIS*
JOEL C. HYNES*
J. BRETT LANE
MARTHA HENLEY SLEDGE (Retired)
MICHAEL T. SMITH (Retired)

D.F. McGOUGAN, JR.
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OTHER OFFICES
TABOR CITY, NC
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*licensed only in SC
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*licensed in NC, DC & SC
**licensed in SC & MO
*Of Counsel

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VIA ELECTRONIC MAIL and U.S. MAIL

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

Re: *Waterfall Investment and Construction Group, LLC v. Jeronimo Ponce d/b/a JP & Sons Builders, et al.*
Appellate Case No. 2024-000772
Our file no. SC-4258-139

Dear Ms. Kitchings:

Please find enclosed for filing *Appellants Motion for Extension of Time to File Initial Brief and Designation of Matter* with *Proof of Service* of same in the above-referenced matter. I have also enclosed our firm's check #15945 in the amount of \$50.00 in payment for the filing fee.

Of course, please do not hesitate to contact me should you have any questions.

With best regards, I am

Very truly yours,


Kenneth R. Moss

KRM/cd
Enclosures as stated
cc: Brandon T. Reeser, Esq. (via email only)