

**RECEIVED**

**Jun 19 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas  
Benjamin H. Culbertson, Circuit Court Judge

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

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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.

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RESPONDENT PATTON DEVELOPMENT SC, LLC  
CONSENT MOTION FOR AN EXTENSION OF TIME TO FILE ITS INITIAL BRIEF AND  
DESIGNATION OF MATTER

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Respondent, Patton Development SC, LLC, pursuant to Rule 240, SCACR, respectfully  
moves for a 30-day extension of time in which to file its initial brief and designation of matter to  
the record on appeal. In support of this motion,

Respondent would show as follows:

1. 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. Appellant filed and served his initial brief on May 22, 2024.

2. Based on the filing of the Appellant's initial brief and designation, Respondent's 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. Respondent requests an extension of 30 days, which would create a new deadline of July 22, 2024 for Respondent to file its initial brief and designation of matter.

4. The undersigned counsel for Respondent Patton Development SC, LLC has conferred with Appellant's counsel regarding this extension request, and he consents to the extension to July 22, 2024. The remaining Respondents were not contacted for their consent.

Respectfully submitted,

*s/ Alexander Hray, Jr.*

Alexander Hray, Jr. SC Bar 2736

389 E. Henry Street, Suite 107

Spartanburg, SC 29302

Telephone: 864-342-1111

Email: [Lex@lexhray.com](mailto:Lex@lexhray.com)

Attorney for Respondent Patton Development SC, LLC

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Nicholas F. Wilson,

Appellant,

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.

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PROOF OF SERVICE

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I certify that I have served the foregoing Motion for Extension of Time to File Respondent Patton Development SC, LLC's Initial Brief and Designation of Matter on the following counsel of record using the primary email address listed in the Attorney Information System per order in Appellate Case No. 2020-000447 and, as to Pro se Respondents, via US mail.

Wesley D. Few, Esq.  
Post Office Box 9398  
Greenville, South Carolina 29604  
(864) 527-5906  
[wes@wesleyfew.com](mailto:wes@wesleyfew.com)

Attorney for Appellant

William James Luse, Esq.  
Law Office of William J. Luse  
917 Broadway Street  
Myrtle Beach, SC 29577  
(843) 839-4975  
[Bill@getlusenow.com](mailto:Bill@getlusenow.com)

Attorney for Respondents Janet P. Gochenour; Janet P. Gochenour Trustee

James B. Parker (Pro se)  
James B. Parker, Sr. (Pro se)  
Mary Ann Parker (Pro Se)  
919 Waterton Avenue  
Myrtle Beach, SC 29579

Claude Townsend Prevost, III, Esq.  
Joseph Lucas Richardson, Esq.  
Collins & Lacy, PC  
P. O. Box 12487  
1330 Lady Street  
Columbia, SC 29201  
(803) 256-2660  
[lrichardson@collinsandlacy.com](mailto:lrichardson@collinsandlacy.com)  
[cprevost@collinsandlacy.com](mailto:cprevost@collinsandlacy.com)

Attorneys for Respondents Kenneth Gregory Moore and R&G Corp., d/b/a Century 21 The Harrelson Group

Robert Bruce Wallace, Esq.  
Maynard Nexsen, PC  
205 King Street, Suite 400  
Charleston, SC 29401  
(843) 720-1760  
[bwallace@maynardnexsen.com](mailto:bwallace@maynardnexsen.com)

Attorney for Respondent Sonia M. Raymond and Raymond Law Firm, P.A.

Matthew Douglas Patterson, Esq.  
Blake T. Williams, Esq.  
Nelson Mullins Riley & Scarborough, LLP  
1320 Main Street, 17th Floor (29201)  
P. O. Box 11070  
Columbia, SC 29201  
(803) 799-2000

[Matt.patterson@nelsonmullins.com](mailto:Matt.patterson@nelsonmullins.com)  
[Blake.williams@nelsonmullins.com](mailto:Blake.williams@nelsonmullins.com)

Attorneys for Flagstar Bank, N.A.

*s/Alexander Hray, Jr.*  
\_\_\_\_\_  
Alexander Hray, Jr., SC Bar No. 2736  
Alexander Hray, Jr., Attorney  
389 E. Henry Street, Suite 107  
Spartanburg, SC 29302  
Telephone: (864) 342-1111  
Email: [Lex@lexhray.com](mailto:Lex@lexhray.com)

Attorney for Respondent Patton Development SC, LLC

June 19, 2024

ALEXANDER HRAY, JR.  
ATTORNEY AT LAW  
389 EAST HENRY STREET, SUITE 107  
SPARTANBURG, SC 29302  
Phone: (864) 342-1111 FAX: (864) 342-1113  
E-mail: Lex@lexhray.com

RECEIVED  
Jun 19 2024  
SC Court of Appeals

Via UPS

June 19, 2024

The Honorable Jenny Abbott Kitchens  
Clerk of Court  
South Carolina Court of Appeals  
Calhoun Building  
1220 Senate Street  
Columbia, SC 29201

Re: Nicholas F. Wilson vs. Janet P. Gochenour, *et al.*  
Ct. App. No. 2024-000440  
C.A. NO.: 2023-CP-26-02475  
My file number: 6357

Dear Ms. Kitchens:

Enclosed herewith you will find my check in the sum of \$50.00 representing the Filing Fee for the Motion of Extension of Time submitted on behalf of the Respondent Patton Development SC, LLC. The motion was filed via email this date.

Very truly yours,

s/Alexander Hray, Jr.  
Alexander Hray, Jr., Attorney

AH  
Enclosure as noted  
cc: All parties of record and to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)