

RECEIVED

Jun 26 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. William A. McKinnon, Circuit Court Judge

Case No. 2023-CP-42-04147
Appellate Case No. 2024-000468

Lorraine Voros, by and through her Attorney-in-Fact, John Voros,.....Respondents,

v.

Pacifica Skylyn, LLC,.....Appellant.

MOTION FOR EXTENSION OF TIME

Respondents respectfully move this Court for an Order pursuant to Rule 263(b), SCACR for a thirty (30) day extension of time in which to file and serve their Initial Brief and Designation of Matter to be included in the Record on Appeal, which is presently due on July 13, 2024. Time has not yet expired for Respondents to file and serve their Initial Brief and Designation of Matter. This motion is not made for the purpose of undue delay and is the first request for an extension of time.

Counsel seeks additional time for drafting the initial brief due to workloads in other matters. With the requested extension, Respondents' Initial Brief and Designation of Matter would be due on August 12, 2024.

KNIE & SHEALY

/s/ Patrick E. Knie

Patrick E. Knie (S.C. Bar No. 3564)

pat@knieshealy.com

Matthew W. Shealy (S.C. Bar No. 77724)

matt@knieshealy.com

P.O. Box 5159

250 Magnolia Street (29306)

Spartanburg, S.C. 29304

Telephone: (864) 582-5118

Telefax: (864) 585-1615

Attorneys for Respondents

Other Counsel of Record:

Jonathan G. Roquemore

jroquemore@hedrickgardner.com

Joshua D. Shaw

jshaw@hedrickgardner.com

Paul E. Allen, Jr.

pallen@hedrickgardner.com

Hedrick Gardner Kincheloe & Garofalo LLP

1230 Main Street, Suite 325

Columbia, South Carolina 29201

Attorneys for Appellant

RECEIVED

Jun 26 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. William A. McKinnon, Circuit Court Judge

Case No. 2023-CP-42-04147
Appellate Case No. 2024-000468

Lorraine Voros, by and through her Attorney-in-Fact, John Voros,.....Respondents,

v.

Pacifica Skylyn, LLC,.....Appellant.

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing Motion for Extension of Time in the above-captioned case has been served on the following parties via e-mail, on June 26 , 2024, pursuant to the South Carolina Supreme Court Order No. 2020-000447, as amended on May 5, 2022:

Jonathan G. Roquemore
jroquemore@hedrickgardner.com
Joshua D. Shaw
jshaw@hedrickgardner.com
Paul E. Allen, Jr.
pallen@hedrickgardner.com
Hedrick Gardner Kincheloe & Garofalo LLP
1230 Main Street, Suite 325
Columbia, South Carolina 29201

Attorneys for Appellant

/s/ Patrick E. Knie

Patrick E. Knie (S.C. Bar No. 3564)

June 26, 2024

RECEIVED

Jun 26 2024

SC Court of Appeals

KNIE & SHEALY

ATTORNEYS AT LAW

250 Magnolia Street

Spartanburg, S.C. 29306

Telephone No. (864) 582-5118

Fax No. (864) 585-1615

Patrick E. Knie

pat@knieshealy.com

Mailing Address:
P.O. Box 5159 (29304)

June 26, 2024

VIA E-MAIL

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Lorraine Voros, by and through her duly appointed Attorney-in-Fact, John Voros, v. Pacifica Skylyn, LLC, Respondents, v. Pacifica Skylyn, LLC, Appellant
Civil Action No.: 2023-CP-42-04147
Appellate Case No.: 2024-000468

Dear Ms. Kitchings:

Enclosed for filing are Respondents' Motion for Extension of Time to serve and file Initial Brief and Designation of Matter. I have also enclosed the Certificate of Service for filing.

The Fifty (\$50.00) Dollars filing fee will be submitted under separate cover within five (5) days of the filing of the Motion.

Sincerely,

Patrick E. Knie

Patrick E. Knie

PEK:mbg
Enclosures

cc: All Counsel of Record (Via Email)