

**RECEIVED**

**Jul 11 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

Hon. 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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**MOTION FOR EXTENSION OF TIME TO FILE  
RESPONDENTS' INITIAL BRIEF AND DESIGNATION OF MATTER**

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Sonia M. Raymond and Raymond Law Firm, P.A., (collectively, "Respondents") respectfully move for a 21-day extension of time in which to file their initial brief and designation of matter to the record on appeal. See Rule 263(b), SCACR. This motion is made on the grounds that due to Respondents' pending Motion to Dismiss the Appeal and the Court's granting Appellant's Motion for Extension to file his Return to the Motion to Dismiss. This is Respondents' second request for an extension. This motion is made in good faith and not for purposes of delay. Respondents' Initial Brief and Designation of

Matter are presently due on July 22, 2024. Counsel for Appellant has consented to this extension. The extension, if granted, would result in a new deadline of August 12, 2024.

Respectfully submitted,

s/Bruce Wallace

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*Attorneys for Respondents Sonia M. Raymond  
and Raymond Law Firm, P.A.*

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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 Respondents' Initial Brief and Designation of Matter on the following counsel of record using the primary email address listed in the Attorney Information System.

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Attorneys for Flagstar Bank, N.A.

July 11, 2024

s/ Bruce Wallace