

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

64650

APPEAL FROM MARION COUNTY
Court of Common Pleas

Haigh Porter, Special Referee

Case No. 2011-CP-33-00016

Wells Fargo Bank, N.A. successor-in-interest
to Wachovia Bank, National Association Respondent,

v.

Marion Amphitheatre, LLC, David P. Gannon,
Michael Guarco, Carolina Entertainment Complex, LLC
and 4 Prophets, LLC a/k/a 4 Profits, LLC Defendants,

Of Whom,
Marion Amphitheatre, LLC, and Michael Guarco are the Appellants,

**APPELLANTS' MOTION FOR EXTENSION OF TIME TO
FILE ITS INITIAL BRIEF AND DESIGNATION OF MATTER**

The Appellants Marion Amphitheatre, LLC, and Michael Guarco move before the Court pursuant to Rule 240 SCACR for an Order extending the time for filing their Initial Brief and Designation of Matter in the above-referenced matter by thirty (30) days. The motion is based upon Rule 240 SCACR and Appellants' desire to file the most effective brief possible. The Appellants do not anticipate the need to request any additional extensions of briefing time for this matter.

WILLCOX, BUYCK & WILLIAMS, P.A.

By: *E. Lloyd Willcox*
E. LLOYD WILLCOX, II I.D. No. 015093
PO Box 1909
Florence, SC 29503-1909
(843) 662-3258 - Tel - (843) 662-1342 - Fax
Attorney for Appellants

September 3, 2013

Other Counsel of Record:
David B. Wheeler, Esquire
Moore & Van Allen PLLC
PO Box 22828
Charleston, SC 29413-2828
**Attorney for Respondent Wells Fargo Bank, N.A.
successor-in-interest to Wachovia Bank, National Association**

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and 4 Prophets, LLC a/k/a 4 Profits, LLC Defendants,

Of Whom,
Marion Amphitheatre, LLC, and Michael Guarco are the Appellants,

PROOF OF SERVICE

I certify that I have served the **Appellants' Motion for Extension of Time to File its Initial Brief and Designation of Matter** on the *Respondent*, through their attorney of record, by depositing a copy of same in the United States Mail, postage prepared, to:

David B. Wheeler, Esquire
Moore & Van Allen PLLC
PO Box 22828
Charleston, SC 29413-2828

**Attorney for Respondent Wells Fargo Bank, N.A.
successor-in-interest to Wachovia Bank, National Association**

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By:

S. Lloyd Willcox

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Attorney for Appellants

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v.

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Of Whom,
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PO Box 22828
Charleston, SC 29413-2828
**Attorney for Respondent Wells Fargo Bank, N.A.
successor-in-interest to Wachovia Bank, National Association**

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E. LLOYD WILLCOX, II I.D. No. 015093
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Mark W. Buyck, Jr.
Hugh L. Willcox, Jr.
Wm. Reynolds Williams ♦
Mark W. Buyck, III
E. Lloyd Willcox, II
John H. Muench † GA & KY
Tracy L. Wright
Jennifer Mullins † NC
J. Scott Kozacki
Walker H. Willcox

† Additionally Licensed
♦ Certified Mediator

LAW OFFICES
WILLCOX, BUYCK, & WILLIAMS
PROFESSIONAL ASSOCIATION
www.WillcoxLaw.com
248 West Evans Street (29501)
Post Office Box 1909
Florence, South Carolina 29503-1909

ESTABLISHED 1895

Telephone (843) 662-3258
Fax (843) 662-1342

September 3, 2013

2050 Corporate Centre Dr
Suite 230
Myrtle Beach, SC 29577
Telephone (843) 650-6777
Fax (843) 650-6767

Reply To: Florence

HONORABLE JENNY ABBOTT KITCHINGS
CLERK OF COURT
SC COURT OF APPEALS
PO BOX 11629
COLUMBIA SC 29211

RE: Wells Fargo v. Marion Amphitheatre, LLC, Guarco, et al
Case No.: 2011-CP-33-00016
Appellate Case No. 2013-001475
Our File No. 15491.15631

Dear Ms. Kitchings:

Enclosed for filing is an **original** and one copy of **Appellants' Motion for Extension of Time to File its Initial Brief and Designation of Matter and Proof of Service** in the above captioned case. Also, enclosed is our check in the amount of \$25 for the filing fee.

Please time stamp the enclosed copy and return to me in the envelope provided for your convenience.

Thank you for your assistance in this matter.

Yours very truly,



E. Lloyd Willcox, II
Email: lloyd@WillcoxLaw.Com

ELW/jaj
Enclosures

cc: David B. Wheeler, Esquire
Mr. Michael Guarco

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