

RECEIVED

Oct 16 2024

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Lancaster County
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

Case No. 2022-CP-29-00240
Appellate Case No. 2023-001980

Jenna Robbins,

Appellant,

v.

IMF13, LLC d/b/a The Indigo at Cross Creek, Taft Management Group, Taft Family Ventures, Southern-eez Landscaping, LLC, and Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping,

of which Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping is

Respondent.

**MOTION FOR EXTENSION OF TIME TO
FILE/SERVE INITIAL BRIEF OF RESPONDENT**

CLEMENT RIVERS, LLP
Catherine H. Chase (SC Bar No. 74593)
Graydon V. Olive, IV (SC Bar No. 105319)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402-0993)
Charleston, South Carolina 29401
(843) 720-5488
cchase@ycrlaw.com
golive@ycrlaw.com

**additional counsel listed on next page*

and

WOLFE, GUNST & HINSON, PLLC

Brian E. Wolfe (SC Bar No. 77463)

Robert C. Gunst, Jr. (SC Bar No. 102957)

Joshua R. Hinson (SC Bar No. 102270)

215 Queens Road, Suite 200

Charlotte, NC 28204

(704) 827-3774

bwolfe@wolfegunst.com

rgunst@wolfegunst.com

jhinson@wolfegunst.com

Attorneys for Respondent

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Respondent Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(2), the deadline for Respondent's initial brief and designation of matter is October 18, 2024. On account of work-related and other time commitments, Respondent respectfully requests this deadline be extended by 30 days. Respectfully, Respondent believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

The undersigned counsel consulted with counsel for Appellant and has been advised that Appellant's counsel has no objection to this request.

WHEREFORE, Respondent moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving the initial brief and designation of matter would be November 18, 2024, according to the undersigned's calculations. Further, Respondent respectfully requests the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/ Catherine H. Chase

Catherine H. Chase (SC Bar No. 74593)
Graydon V. Olive, IV (SC Bar No. 105319)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402-0993)
Charleston, South Carolina 29401
(843) 720-5488
cchase@ycrlaw.com
golive@ycrlaw.com

and

WOLFE, GUNST & HINSON, PLLC
Brian E. Wolfe (SC Bar No. 77463)
Robert C. Gunst, Jr. (SC Bar No. 102957)
Joshua R. Hinson (SC Bar No. 102270)
215 Queens Road, Suite 200
Charlotte, NC 28204
(704) 827-3774
bwolfe@wolfegunst.com
rgunst@wolfegunst.com
jhinson@wolfegunst.com

Attorneys for Respondent

Charleston, South Carolina

October 16, 2024

RECEIVED

Oct 16 2024

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Lancaster County
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

Case No. 2022-CP-29-00240
Appellate Case No. 2023-001980

Jenna Robbins,

Appellant,

v.

IMF13, LLC d/b/a The Indigo at Cross Creek, Taft Management Group, Taft Family Ventures, Southern-eez Landscaping, LLC, and Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping,

of which Southern Horticulture Group, LLC d/b/a Southern-eez Landscaping is

Respondent.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Catherine H. Chase (SC Bar No. 74593)
Graydon V. Olive, IV (SC Bar No. 105319)
25 Calhoun Street, Suite 400
P.O. Box 993 (29402-0993)
Charleston, South Carolina 29401
(843) 720-5488
cchase@ycrlaw.com
golive@ycrlaw.com

**additional counsel listed on next page*

and

WOLFE, GUNST & HINSON, PLLC

Brian E. Wolfe (SC Bar No. 77463)

Robert C. Gunst, Jr. (SC Bar No. 102957)

Joshua R. Hinson (SC Bar No. 102270)

215 Queens Road, Suite 200

Charlotte, NC 28204

(704) 827-3774

bwolfe@wolfegunst.com

rgunst@wolfegunst.com

jhinson@wolfegunst.com

Attorneys for Respondent

I, Catherine H. Chase, of Clement Rivers, LLP, attorneys for Respondent, hereby certify that Respondent's **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT** was served on all other parties to this appeal on October 16, 2024, via email (see attached) to their following counsel of record:

Andrew Sims Radeker, drew@radekerlaw.com
Radeker Law, P.A.
PO Box 6903
Columbia, SC 29260

Attorneys for Appellant

James Andrew Bradshaw, drew@wdwlawfirm.com
Kyle Jason White, kyle@wdwlawfirm.com
White, Davis & White Law Firm, PA
209 E. Calhoun Street
Anderson, SC 29621

Attorneys for Appellant

Brian E. Wolfe, bwolfe@wolfegunst.com
Robert C. Gunst, Jr., rgunst@wolfegunst.com
Joshua R. Hinson, jhinson@wolfegunst.com
WOLFE, GUNST & HINSON, PLLC
215 Queens Road, Suite 200
Charlotte, NC 28204

Attorneys for Respondent

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Catherine H. Chase
Catherine H. Chase (SC Bar No. 74593)
Attorney for Respondent

Charleston, South Carolina

Dated: October 16, 2024

From: [Bell, Pollyana \(Polly\)](#)
To: drew@radekerlaw.com; drew@wdwlawfirm.com; kyle@wdwlawfirm.com; [Brian Wolfe](#); [Robert Gunst](#); [Josh Hinson](#)
Cc: [Chase, Catherine](#); [Whirl, Jonay](#); [Olive, IV, Graydon](#)
Subject: Robbins v. IMF13, LLC; Appellate Case No. 2023-001980 (CR 230494)
Date: Wednesday, October 16, 2024 1:15:32 PM
Attachments: [1st Motion for Extension - Initial Brief.pdf](#)
[image001.png](#)

Enclosed please find Respondent's Motion for Extension of Time to File/Serve their Initial Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
yctrlaw.com