

In The South Carolina Court of Appeals On Appeal From the Kershaw County  
Court of Appellate Case No: 2024-000679

Joseph and Lauren Jaco,  
Respondent,

v.  
J.N. Green and Associates et. Al.

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Nov 05 2024

SC Court of Appeals

Appellant.

**APPELLANT'S SECOND MOTION FOR EXTENSION OF TIME TO FILE AND SERVE  
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL**

1. Pursuant to order of this Court dated October 6, the Appellant's Initial Brief and Designation of Matter is due to be served and filed today, November 4, 2024..
2. Counsel, who works and resides in Greenville, South Carolina, previously requested a thirty-day extension to file Appellant's Initial Brief because the effects of Hurricane Helene caused Counsel's home and office to be without electricity and/or internet service for an extended period of time. As a result of being without power and/or internet services for an extended period, Counsel, who is a solo practitioner, was also faced with an extraordinary backlog of work due to the effect of the outages.
3. Counsel for the Appellant has exercised diligent efforts to comply with the timeline established by this Court's initial order. However, unforeseen demands on counsel's schedule have arisen due to the necessity of preparing for two significant trials taking place over the next two weeks in Greenville South Carolina. These preparations have required extraordinary attention and time. Furthermore, the complexities of issues involved in this

appeal have necessitated extensive legal analysis, contributing to an unexpectedly prolonged drafting process for the Appellant's Initial Brief.

4. Counsel's private practice is a solo practice, which precludes the assistance of co-counsel to share responsibilities in the preparation of this matter,
5. This motion is not made for the purpose of delay. Rather, it is necessary to ensure that Counsel for the Appellant can adequately prepare and provide a complete and thorough Initial Brief.
6. Therefore, the Appellant requests an extension of time until December 4, 2024, to file and serve Appellant's Initial Brief and Designation of Matter. The Appellant also requests that all timelines be held in abeyance until a decision has been made by this Court on this Motion.

Respectfully submitted,  
Turner Law, LLC  
By: s/Adrienne Turner

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November 4, 2024  
Greenville, South Carolina