

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

Brian M. Gibbons, Circuit Judge

Appellate Case No. 2023-001980

Jenna Robbins,.....Appellant,

v.

Imfi3, LLC, D/B/A The Indigo At Cross Creek, Taft Management Group, Taft Family Ventures, and Southern-EEZ Landscaping, LLC, Defendants,

Southern Horticulture Group, LLC d/b/a Southern-EEZ Landscaping, Intervenor/Contested-Status Defendant,

Of whom Southern Horticulture Group, LLC d/b/a Southern-EEZ Landscaping a/k/a Southern-EEZ Landscaping, LLC is the.....Respondent.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
INITIAL REPLY BRIEF AND DESIGNATION

Appellant hereby moves pursuant to Rule 263(b), SCACR, for an extension of time to January 16, 2025, of the time to serve and file Appellant’s initial reply brief and any accompanying designation of matter in this appeal. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The initial reply brief deadline is currently today, December 30, 2024. Holiday vacation has eaten into the undersigned’s time, and the brief has not yet been written. Further, the undersigned has continuing legal education seminar materials that are due today, and the

undersigned is also hosting holiday entertaining events both tomorrow and the day after.

2. In addition, the undersigned's upcoming schedule for the next couple of weeks includes presentation at that continuing legal education seminar and a number of depositions.
3. Accordingly, Appellant seeks an extension of this briefing deadline through January 16, 2025.
4. This is the first extension sought of this deadline.
5. There is good cause for the requested extension.
6. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Appellant prays for an order granting an extension of time to January 16, 2025, of the time to serve and file Appellant's initial reply brief and any accompanying designation of matter in this appeal.

Respectfully submitted,

/s/ Andrew S. Radeker

Andrew S. Radeker
S.C. Bar No. 73743
Radeker Law, P.A.
Post Office Box 6903
Columbia, South Carolina 29260
(803) 500-0891
drew@radekerlaw.com

and

Kyle J. White
S.C. Bar No. 101426
Drew Bradshaw
S.C. Bar No. 100548
White Davis and White Law Firm, PA
Post Office Box 1346
Anderson, South Carolina 29622
(864) 231-8090
kyle@wdwlawfirm.com
drew@wdwlawfirm.com
Attorneys for Appellant

December 30, 2024

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas
Brian M. Gibbons, Circuit Judge

Appellate Case No. 2023-001980

Jenna Robbins,.....Appellant,

v.

Imfi3, LLC, D/B/A The Indigo At Cross Creek, Taft Management Group, Taft Family Ventures, and Southern-EEZ Landscaping, LLC, Defendants,

Southern Horticulture Group, LLC d/b/a Southern-EEZ Landscaping, Intervenor/Contested-Status Defendant,

Of whom Southern Horticulture Group, LLC d/b/a Southern-EEZ Landscaping a/k/a Southern-EEZ Landscaping, LLC is the.....Respondent.

PROOF OF SERVICE

I certify that I have served the foregoing motion for extension on the date given below by emailing it to all opposing counsel of record at the address(es) noted below.

- Brian E. Wolfe, Esq., at bwolfe@wolfegunst.com
- Robert C. Gunst, Jr., Esq., at rgunst@wolfegunst.com
- Joshua R. Hinson, Esq., at jhinson@wolfegunst.com
- Mark S. Barrow, Esq., at msb@swblaw.com
- Adam M. Crain, Esq., at amc@swblaw.com
- Catherine C. Chase, Esq., at cchase@yrcrlaw.com
- Graydon V. Olive IV, Esq., at golive@yrcrlaw.com

/s/ Andrew S. Radeker
Andrew S. Radeker, S.C. Bar No. 73743
Attorney for Appellant

December 30, 2024