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Jan 21 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Daniel Coble

Appellate Case No.: 2023-001226

Home River Group.....Respondent,

vs.

Ernest McKnight, Jr.....Appellant.

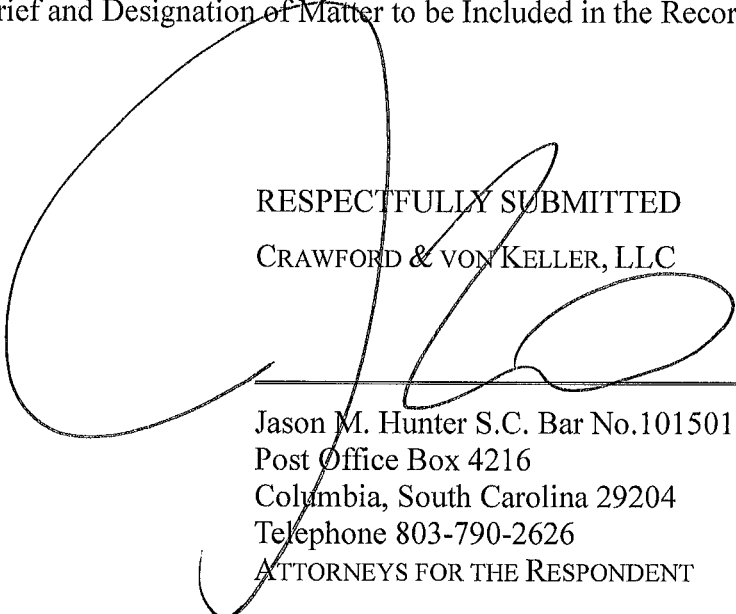
MOTION FOR AN EXTENSION TO FILE DESIGNATION OF MATTER

Jason M. Hunter
Crawford & von Keller, LLC
Post Office Box 4216
Columbia, South Carolina 29204
Telephone 803-790-2626
ATTORNEYS FOR THE RESPONDENT

Respondent hereby moves pursuant to Rule 263(b), SCACR, for an extension of the time in which to serve and file Respondent's Designation of Matter to be Included in the Record on Appeal in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. Respondent inadvertently failed to include its Designation of Matter to be Included in the Record on Appeal in this case with the filing of its Initial Brief. Further, Appellant had not until very recently filed its own Designation of Matter to be Included in the Record on Appeal to which Respondent could consider in the drafting of its own filing. A copy of Respondent's proposed Designation of Matters to be Included in the Record on Appeal is attached hereto as Exhibit 'A' and made a part hereof by reference.

WHEREFORE Respondent prays for an order extending the time in which to serve and file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal.



RESPECTFULLY SUBMITTED
CRAWFORD & VON KELLER, LLC

Jason M. Hunter S.C. Bar No.101501
Post Office Box 4216
Columbia, South Carolina 29204
Telephone 803-790-2626
ATTORNEYS FOR THE RESPONDENT

Columbia, SC
January 20, 2025

Exhibit ‘A’

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Daniel Coble

Appellate Case No.: 2023-001226

Home River Group.....Respondent,

vs.

Ernest McKnight, Jr.....Appellant.

**RESPONDENT'S DESIGNATION OF MATTERS TO BE INCLUDED IN THE
RECORD ON APPEAL**

Jason M. Hunter
Crawford & von Keller, LLC
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Telephone 803-790-2626
ATTORNEYS FOR THE RESPONDENT

Pursuant to Rule 209 of the South Carolina Appellate Court Rules, Respondent Home River Group, through its undersigned counsel, submits the following to be included in the Record on Appeal:

1. Notice of Civil Appeal filed May 1, 2024 in C/A No. 2024-CP-40-02696.
2. Magistrate's Dismissal on Appeal filed June 12, 2024 in C/A No. 2024-CP-40-02696.
3. Motion of Appellant filed June 14, 2024 in C/A No. 2024-CP-40-02696.
4. Affidavit filed on behalf of Respondent and Exhibits thereto, filed on June 28, 2024 in C/A No. 2024-CP-40-02696.
5. Order denying Appellant's Motion for Reconsideration or or Relief From Judgment, filed on July 19, 2024 in C/A No. 2024-CP-40-02696.

I certify that the above-referenced materials contain reference to no matter which is irrelevant to the instant appeal.



RESPECTFULLY SUBMITTED
CRAWFORD & VON KELLER, LLC

Jason M. Hunter S.C. Bar No.101501
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Home River Group.....Respondent,

vs.

Ernest McKnight, Jr.....Appellant.

PROOF OF SERVICE

I, Jason Hunter certify that I have served the foregoing Motion and Exhibit 'A'
(Designation of Matter of Respondent) in this matter on January 21, 2025, by mailing it to
opposing counsel addressed as follows:

G. Robin Alley, Esquire
ISAACS & ALLEY
P. O. Box 8596
Columbia, SC 29202

CRAWFORD & VON KELLER, LLC

/s/ Jason M. Hunter

Theodore von Keller, S.C. Bar No. 5718
B. Lindsay Crawford, III S.C. Bar No. 6510
B. Lindsay Crawford, IV S.C. Bar No. 101707
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ATTORNEYS FOR THE PLAINTIFF

Columbia, SC
January 20, 2025

SOUTH CAROLINA

B. Lindsay Crawford, III*
Theodore von Keller
B. Lindsay Crawford, IV**
Jason M. Hunter

Charley FitzSimons MacInnis
Eric H. Nelson
Katharyn L. Sophia**
Lawrence W. Johnson Jr.* - Special Counsel



CRAWFORD & VON KELLER, LLC

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NORTH CAROLINA

Benjamin A. Barco
Gregory P. Cowan**
Jonathan Payne
Alise Matherson

*Certified Specialist in Bankruptcy and Debtor-Creditor Law in SC
**Admitted in South Carolina and North Carolina

January 21, 2025

Email: ctappfilings@sccourts.org and Regular Mail

Clerk, SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

**RE: Home River Group vs. Ernest McKnight, Jr.
Case No: 2024-CP-40-02692
Appellate Case No.: 2023-001226
Our file number: 0062-23-0013.02**

Dear Clerk:

Enclosed please find Respondent's Motion for an Extension to File Designation of Matter and Proof of Service in the above-mentioned matter. Please file accordingly. Also, contact our office with any questions or concerns.

Sincerely,

Jason M. Hunter, Esquire

JMH/tdd

Enclosures ; Documents + check

Cc: G. Robin Alley, Esquire
ISAACS & ALLEY
P. O. Box 8596
Columbia, SC 29202

WE ARE A DEBT COLLECTOR. THIS COMMUNICATION IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.



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