

**RECEIVED**

**May 01 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY  
Court of Common Pleas  
Jeremy C. Hodges, Esquire, Special Referee

Case No. 2022-CP-28-00877  
Appellate Case No.: 2024-000679

Joseph and Lauren Jaco.....Respondents,

vs.

J.N. Green and Associates, LLC, Big Blue Express, LLC, and Joe N. Green.....Appellants.

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**RESPONDENTS’ MOTION REQUESTING  
EXTENSION OF TIME TO FILE INITIAL BRIEF  
AND DESIGNATION OF MATTER**

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Respondents, Joseph and Lauren Jaco, seek an Order of this Court, pursuant to Rule 240, SCACR, extending the time to file their Initial Brief and Designation of Matter in the above-captioned appeal. Respondents’ Initial Brief and Designation of Matter is currently due to be filed on May 1, 2025.

Respondents request an additional one (1) week extension of time to allow adequate time for counsel to prepare their initial brief. This request is not made for purposes of undue delay or any other improper purpose and this is the first extension of time sought by Respondents.

THEREFORE, the Respondents request an Order extending the time to file and serve the Initial Brief of Respondents and Designation of Matter for seven (7) days, making the new deadline May 8, 2025.

Respectfully submitted,

**CALLISON TIGHE & ROBINSON, LLC**

*s/ Ian T. Duggan*

Demetri K. Koutrakos, SC Bar No. 11318

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*Attorneys for Respondents*

*Joseph and Lauren Jaco*

May 1, 2025

Columbia, South Carolina

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Joseph and Lauren Jaco.....Respondents,

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**PROOF OF SERVICE**

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I hereby certify that, on this date, the **RESPONDENTS’ MOTION REQUESTING EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER** was served on Appellants’ counsel via first-class mail delivery, and by email, pursuant to Supreme Court Order dated April 24, 2024, as follows:

Adrienne L. Turner, Esquire  
Turner Law, LLC  
887 Pine Log Ford Road  
Travelers Rest, SC 29690  
[aturner@turnerlawsc.com](mailto:aturner@turnerlawsc.com)  
*Attorney for Appellants*  
*J.N. Green & Associates, LLC,*  
*Big Blue Express, LLC, and Joe N. Green*

I further certify that all parties required by Rule to be served have been served.

*s/ Ian T. Duggan*  
\_\_\_\_\_  
Ian T. Duggan, SC Bar No. 80074

May 1, 2025  
Columbia, South Carolina

Ian T. Duggan - Lawyer  
Telephone: 803-404-6900  
[IanDuggan@callisontighe.com](mailto:IanDuggan@callisontighe.com)

May 1, 2025

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**May 01 2025**  
SC Court of Appeals

**VIA EMAIL: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**Re: Joseph and Lauren Jaco vs. J.N. Green and Associates, LLC, Big Blue Express, LLC, and Joe N. Green  
Appellate Tracking No. 2024-000679  
Our File No. 8728.001**

Dear Ms. Kitchings:

Enclosed herewith please find the Respondents' Motion Requesting Extension of Time to File Initial Brief and Designation of Matter, together with the Proof of Service, in the above-referenced matter. Kindly file the same and return a clocked-in copy of each to the undersigned via return email. My firm's check in the amount of \$50.00 as the filing fee for the Motion will be hand-delivered to the Court.

The enclosed documents have been served upon Appellants' counsel today via email and first-class mail as indicated in the Proof of Service.

Please feel free to contact me with any questions. Thank you.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

*s/ Ian J. Duggan*

Ian T. Duggan

ITD:kam  
Enclosures

May 1, 2025  
Page Two

cc: (w/ encl.)  
Adrienne L. Turner, Esquire (via email and first-class mail)  
Joseph and Lauren Jaco (via email)