

IN THE COURT OF APPEALS OF SOUTH CAROLINA

CASE NO.: 2022-CP-28-00877JOSEPH AND LAUREN JACO,
Respondents,

v.

J.N. GREEN & ASSOCIATES, LLC, BIG BLUE EXPRESS, LLC, AND JOE N. GREEN,
Appellants.

APPELLANTS' MOTION FOR EXTENSION OF TIME AND LEAVE TO FILE REPLY BRIEF OUT OF TIME AND FOR RELATED RELIEF

Appellants, by and through their counsel, respectfully move this Court for an extension of time and leave to file their reply brief out of time and for additional relief as follows:

1. Due to an inadvertent calendaring mistake in counsel's office, the deadline for filing the reply brief was miscalculated, partially due to the Respondents' delayed filing of their initial brief and subsequent submission of the brief before the Court ruled on the motion.
2. Appellants believe that a reply brief will assist the Court in fully understanding the issues on appeal and that the Appellants' position will be more clearly presented with the inclusion of this brief.
3. Appellants request that any deadlines related to perfecting the appeal be held in abeyance pending the Court's ruling on this motion to avoid any further procedural issues.
4. Appellants also seek an order from the Court directing Respondents to provide any correspondence involving the Special Referee that was not previously shared with Appellants' counsel so that these documents can be included in the record on appeal.
5. This motion is not made for purposes of delay but is necessitated by the circumstances described above.

For these reasons, Appellants respectfully request that the Court grant this motion, hold all applicable deadlines in abeyance, and order the inclusion of the specified correspondence in the record on appeal.

Respectfully submitted,

/s/Adrienne Turner

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