

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
OCT 21 2013
SC COURT OF APPEALS

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

Alexander S. Macaulay, Circuit Court Judge

Civil Action No.: 2005-CP-37-00788

Tri-County Development et. al.
Jeff Gray and Melinda
Holbrooks,.....Respondents

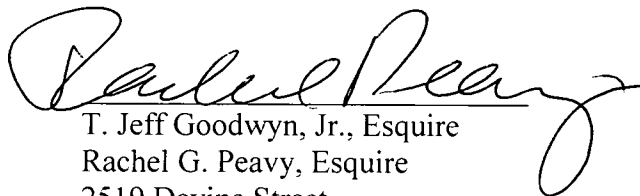
v.

Christopher A. Pierce,.....Appellant

**APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE RECORD ON APPEAL**

Appellant hereby moves for an additional four (4) days in which to file the Record on Appeal, which is currently due on October 21, 2013. Due to his heavy trial schedule, counsel for the Respondents, Tom Dudley, had not provided Appellant's counsel with documents that need to be included in the record on appeal until late today, thereby delaying delivery of the documents to the printers. This is a relatively complex appeal that will require significant time to properly complete.

GOODWYN LAW FIRM, LLC

A handwritten signature in cursive script, appearing to read "Rachel Peavy", written over a horizontal line.

T. Jeff Goodwyn, Jr., Esquire
Rachel G. Peavy, Esquire
2519 Devine Street
Suite A
Columbia, South Carolina 29205
(803) 251-4517
(803) 251-4527 (fax)
JGoodwyn@Goodwynlaw.com
Attorneys for Appellant

October 21, 2013

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v.

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PROOF OF SERVICE

I certify that I have served the **Appellant's Motion for Extension of Time to File Record on Appeal** on Thomas E. Dudley, III, Attorney for Respondent at the address below by depositing a copy of it in the United States Mail, postage prepaid, on October 21, 2013.

Thomas E. Dudley, III, Esquire
Kenison, Dudley & Crawford, LLC
704 East McBee Avenue
Greenville, SC 29601



Mary S. Bush
Paralegal to T. Jeff Goodwyn, Jr.
Goodwyn Law Firm, LLC
2519 Devine Street
Suite A
Columbia, South Carolina 29205
(803) 251-4517

October 21, 2013

GOODWYN LAW FIRM, LLC

2519 Devine Street
Suite A
Columbia, South Carolina 29205

T. Jeff Goodwyn, Jr.*

Special Counsel:
Rachel G. Peavy

*Also Licensed in Georgia

Tel. (803) 251-4517
Fax (803) 251-4527

Email: JGoodwyn@Goodwynlaw.com
Web: www.GoodwynLaw.com

October 21, 2013

VIA HAND DELIVERY

Jenny Abbott Kitchings, Clerk of Court
The South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

70152
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OCT 21 2013
SC Court of Appeals

RE: *Tri-County Development et. al., Jeff Gray and Melinda Holbrooks
Christopher A. Pierce
Civil Action No.: 2005-CP-37-00788
Case No.: 2011202946
Our File No.: 3500-0014*

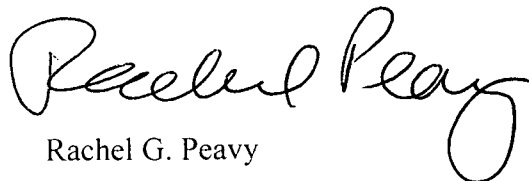
Dear Ms. Kitchings:

Our firm represents the Appellant, Christopher A. Pierce, in the above-referenced appeal. This letter is to request an additional four (4) day extension to file and serve the Record on Appeal. By my calculations, the requested extension would give us until October 25, 2013 to file and serve the Record on Appeal. Counsel for Respondents has consented to this request.

Enclosed is our firm's check in the amount of \$25.00 for the required filing fee.

By copy of this letter, I am notifying Thomas E. Dudley, III, Esquire, counsel for the Respondents of our request for an additional four (4) day extension. Thank you for your assistance with this matter.

Sincerely,



Rachel G. Peavy

RGP/msb
Enclosures

cc: Thomas E. Dudley, III, Esquire
Chris Pierce