

**RECEIVED**

**Jun 26 2025**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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**APPEAL FROM HORRY COUNTY  
ALAN D. CLEMMONS, MASTER-IN-EQUITY**

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**Appellate Case No. 2025-000708  
Lower Court Case No. 2023-CP-26-06121**

United States of America acting through the  
Rural Housing Service or successor agency,  
United States Department of Agriculture, ..... Appellant

v.

Eric M. Vaughn and South Carolina Department of Revenue ..... Respondents

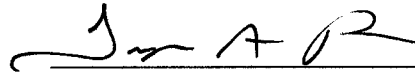
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**APPELLANT UNITED STATES OF AMERICA, ACTING THROUGH THE RURAL  
HOUSING SERVICE OR SUCCESSOR AGENCY, UNITED STATES DEPARTMENT OF  
AGRICULTURE’S SECOND MOTION FOR EXTENSION OF TIME TO FILE INITIAL  
BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED ON APPEAL**

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Appellant United States of America acting through the Rural Housing Service or successor agency, United States Department of Agriculture (hereinafter “Appellant”), by and through its undersigned counsel, respectfully requests a 30 day extension of time or until July 30, 2025 to file the Initial Brief and Designation of Matter of Matter To Be Included on Appeal, which is currently due on June 30, 2025. The request is based on counsel’s and their staff’s workload demands, other commitments, and issues encountered in preparing Appellant’s Initial Brief and Designation of Matter To Be Included on Appeal.

**{ATTORNEY’S SIGNATURE APPEARS ON NEXT PAGE}**



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ATTORNEY FOR APPELLANT

June 26, 2025

Other counsel of record:

Jason Phillip Luther, Esq.  
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South Carolina Department of Revenue

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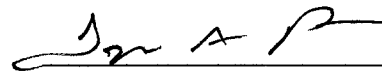
Eric M. Vaughn and South Carolina Department of Revenue ..... Respondents

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**PROOF OF SERVICE**

I certify that I have served Appellant's Second Motion for Extension of Time to File Initial Brief and Designation of Matter to Be Included on Appeal by depositing a copy of it in the United States Mail, postage prepaid on June 26, 2025, addressed to:

1. Eric M. Vaughn  
114 Green Avenue  
Shelby, North Carolina 28152
2. Jason Phillip Luther, Esq.  
SC Department of Revenue, Office of General Counsel  
310-A Outlet Pointe Blvd  
Columbia SC 29210
3. Occupant(s)  
615 Ford Circle  
Conway, South Carolina 29526



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tpeace@hmp-law.com  
ATTORNEY FOR APPELLANT

June 26, 2025

**HMP** HARRELL, MARTIN  
& PEACE, P.A.  
ATTORNEYS AT LAW

---

L.K. "Trey" Harrell, III  
Jeremy C. Martin  
M. Alan Peace \*\*  
Taylor A. Peace  
Erik T. Norton

Robert W. Dibble, Jr. \*  
William Jennings (Bill) Buchanan \*  
Donald W. Tyler \*  
Thomas B. Jackson, III \*  
\*Of Counsel  
\*\*Certified Mediator/Arbitrator

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June 26, 2025

**VIA EMAIL AND REGULAR, FIRST CLASS MAIL**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: United States of America, acting through the Rural Housing Service or  
successor agency, et al., Appellant v. Eric M. Vaughn, et al., Respondents  
Lower Court Case No. 2023-CP-26-06121  
Appellate Case No. 2025-000708  
Our File Number: 2518.2518.28706/TAP

Dear Ms. Kitchings:

Also, due to time constraints on other pending matters, please find enclosed for filing the original and one (1) copy of Appellant United States of America, Acting Through the Rural Housing Service or Successor Agency, United States Department of Agriculture's Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included on Appeal. A motion filing fee in the amount of \$50.00 will be provided by regular mail.

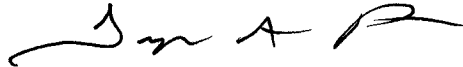
By copy of this letter and as evidenced by the Proof of Service, the filing has been served upon counsel, if any, and the Respondents in this matter.

Ltr. to Court of Appeals with Transcript Request and  
Motion for Extension of Time to File Initial Brief and  
Designation of Matter  
June 26, 2025  
Page 2

Thank you for your time and attention in this matter. If you have any questions, please do not hesitate to contact our office at the phone number below.

Sincerely,

**HARRELL, MARTIN & PEACE, P.A.**

A handwritten signature in black ink, appearing to read "Taylor A. Peace". The signature is fluid and cursive, with a large initial "T" and a long, sweeping underline.

Taylor A. Peace, Esq.

TAP/lws

Enclosures

Cc. Eric M. Vaughn

Jason Phillip Luther, Esq. SC Department of Revenue