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**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
COURT OF COMMON PLEAS

The Honorable David P. Caraker

Case No.: 2022-CP-26-08003  
Appellate Case No.: 2025-000445

Stephanie Hatton and Brandon Deubell..... Appellants,

v.

Sam Investment Properties, LLC, a/k/a  
Archangel Investments, LLC..... Respondent.

**MOTION FOR EXTENSION OF TIME FOR RESPONDENT TO SERVE AND FILE  
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL**

Pursuant to Rule 240, SCACR, respondent Sam Investment Properties, LLC a/k/a Archangel Investments, LLC, moves for an extension of time in which to serve and file respondent's Initial Brief and Designation of Matter to be included in the Record on Appeal ("Designation of Matter"). Respondent requests an extension of twenty (20) days to file the Initial Brief and Designation of Matter which are currently due July 26, 2025. This is the first request for an extension filed by Respondent.

The grounds for this motion are that other impending professional matters and obligations (to include counsel's compliance with the witness subpoena issued by the S.C. Office of the Attorney General in the PCR matter captioned Arthur Jason Bowers #348252 v. State of South Carolina, Case No.: 2022-CP-30-00700) have created a need for additional time to prepare the Initial Brief and Designation of Matter. A twenty-day delay will not prejudice the rights of any of the parties. Granting this motion would require the Initial Brief and Designation of Matter to be filed with the Court no later than August 15, 2025.

For these reasons, Sam Investment Properties, LLC a/k/a Archangel Investments, LLC requests an extension of the deadline for filing and serving the Initial Brief and Designation of Matter until August 15, 2025.

Respectfully submitted this 2<sup>nd</sup> day of July, 2025.

s/ JAY G. ANDERSON  
Jay G. Anderson (SC Bar # 14295)  
**ANDERSON LAW, LLC**  
4447 Highway 17 Business, Suite 101  
Post Office Box 969  
Murrells Inlet, South Carolina 29576  
843/545-6001  
jga@jayanderson.com  
*Attorney for Respondent*

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IN THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM HORRY COUNTY  
COURT OF COMMON PLEAS

The Honorable David P. Caraker

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Case No.: 2022-CP-26-08003

Appellate Case No.: 2025-000445

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Stephanie Hatton and Brandon Deubell,

Appellants,

v.

Sam Investment Properties, LLC, a/k/a  
Archangel Investments, LLC,

Respondent.

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**PROOF OF SERVICE**

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I, the undersigned attorney for Respondent, do hereby certify that I have served Respondent's Motion for Extension of Time for Respondent to Serve and File Initial Brief and Designation of Matter to be Included in the Record on Appeal upon Appellants by depositing a copy of it in the United States Mail, postage prepaid, on July 2, 2025, addressed to Appellants *pro se*, 2379 Clandon Drive, Myrtle Beach, South Carolina 29579. I also certify that I have served Respondent's Motion for Extension of Time for Respondent to Serve and File Initial Brief and Designation of Matter to be Included in the Record on Appeal on July 2, 2025, by electronic mail at [ctappfilings@ssccourts.org](mailto:ctappfilings@ssccourts.org).

July 2, 2025

**ANDERSON LAW, LLC**

By: s/ JAY G. ANDERSON  
Jay G. Anderson  
SC Bar # 14295  
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Post Office Box 969  
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VIA ELECTRONIC TRANSMISSION

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211  
Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: *Stephanie Hatton and Brandon Deubell, Appellants v. Sam Investment Properties, LLC, a/k/a Archangel Investments, LLC, Respondent*  
Circuit Court Case No.: 2022-CP-26-08003  
Appellate Case No.: 2025-000445

Dear Ms. Kitchings:

Please find attached herewith for filing **Respondent's Motion for Extension of Time for Respondent to Serve and File Initial Brief and Designation of Matter to be Included in the Record of Appeal and Proof of Service.**

A check for the \$50 filing fee will follow via USPS.

Thank you for your kind assistance.

Sincerely,

ANDERSON LAW, LLC

s/ **JAY G. ANDERSON**

Jay G. Anderson  
Counsel for Respondent

JGA/gs

Attachment as stated

cc: Stephanie Hatton, Appellant (w/ enclosure)  
Brandon Deubell, Appellant (w/ enclosure)

ANDERSON LAW, LLC  
POST OFFICE BOX 969  
MURRELLS INLET, SC 29576

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
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Columbia, SC 29211

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