

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

R. Keith Kelly, Circuit Judge
J. Derham Cole, Sr., Circuit Judge

Appellate Case No. 2025-000627

PNC Bank, N.A., successor by
merger to PNC Equipment Finance,
LLC,

Respondent,

v.

S & J Asphalt Paving, LLC, Jose
Luis Guerrero, and Scott Robert
Ronson,

Appellants.

**APPELLANTS' MOTION FOR EXTENSION OF TIME TO SERVE AND FILE INITIAL
BRIEF AND DESIGNATION OF MATTER**

Willie H. McAbee III (S.C. Bar #103662)
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Attorney for the Appellants

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SC Court of Appeals

NOW COMES THE APPELLANTS, by and through undersigned counsel of record, and respectfully move pursuant to Rule 240, *SCACR*, for an extension of time in which to serve and file Appellants' Initial Brief and Designation of Matter. Presently, Appellants' Initial Brief and Designation of Matter are due to served and filed on July 8, 2025. Appellants pray for an Order of the Court extending the time to serve and file Appellants' Initial Brief and Designation of Matter until July 22, 2025. Undersigned counsel has conferred with opposing counsel who consent to the requested extension. This is Appellants' first request for an extension of time in this matter.

Respectfully submitted,

s/ W.H. McAbee III

Willie H. McAbee III (S.C. Bar #103662)

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Attorney for the Appellants

Date: July 7, 2025
Greenville, South Carolina

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Appellants.

PROOF OF SERVICE

I certify that I have served Appellants' Motion for Extension of Time to Serve and File Initial Brief and Designation of Matter upon the Respondent by sending the same to Respondent's attorneys of record at the e-mail addresses listed for said counsel in the AIS system this 7th day of July 2025, in accordance with *In re Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024)* (d)(4), S.C. Sup. Ct. Order filed April 24, 2024. A copy of the e-mail to opposing counsel is attached hereto and incorporated by reference.

Respectfully submitted,

s/ W.H. McAbee III

Willie H. McAbee III (S.C. Bar #103662)

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Date: July 7, 2025

Greenville, South Carolina

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WILLIE H. McABEE, III

July 8, 2025

VIA E-MAIL (ctappfilings@sccourts.org) & U.S. MAIL

South Carolina Court of Appeals

Attn: The Honorable Jenny Abbott Kitchings, Clerk of Court

Post Office Box 11629

Columbia, South Carolina 29211

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SC Court of Appeals

RE: *PNC Bank, N.A. v. S & J Asphalt Paving, LLC*
Appellate Case No.: 2025-000627

Dear Ms. Kitchings:

Please find enclosed a copy of Appellants' Motion for Extension of Time to Serve and File Appellants' Initial Brief and Designation of Matter in the above referenced action. Appellants' motion requests that the time to serve and file Appellants' Initial Brief and Designation of Matter be extended till July 22, 2025. Please also find enclosed Appellants' Proof of Service and a check made payable to the South Carolina Court of Appeals in the amount of Fifty & 00/100 (\$50.00) dollars for the filing fee. Should anything further be required please do not hesitate to contact me.

Sincerely,

Willie H. McAbee, III

Enclosures

CC: Clients

Byron L. Saintsing, Esq. (via e-mail only)

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