

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Hon. John C. Hayes, III
Presiding Circuit Court Judge

69871

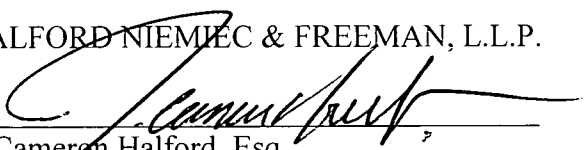
Consolidated case no. 2010-CP-46-2326

Juontonio Pinckney, et al. Apellants,
v.
Epcn Communities, Inc., Epcn Communities Franchising, Inc.,
Brock L. Fankhauser, Fankhauser Property Group, Inc.,
Stonecrest Villas of Tega Cay, LLC,
and
Stonecrest Villas of Tega Cay Owners' Association, Inc. Respondent

NOTICE OF MOTION AND MOTION
BY APPELLANTS COUNSEL TO EXTEND DEADLINE
FOR FILING APPELLANT FINAL BRIEF

The undersigned moves the court pursuant to SCACR 263 to extend the filing deadline for appellants' final brief and the record on appeal by ten (10) days. Counsel for Appellants certifies that he has consulted with opposing counsel prior to filing this motion who indicate no objection to the relief being sought.

HALFORD NIEMIEC & FREEMAN, L.L.P.



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Attorneys for Appellants

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SEP 24 2013

SC Court of Appeals

PROOF OF SERVICE

I hereby certify that I am the attorney for the Appellants in the above captioned matter and that I served a copy of the foregoing Notice of Motion and Motion to Extend Filing Deadline for Appellants Final Brief and Record on Appeal on the attorneys identified below on September 20, 2013.

(Via U.S. Mail and E-mail)

Curtis W. Dowling, Esq.
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(Via E-Mail Only)

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J. Cameron Halford, Esquire
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P. John Freeman, Esquire

September 20, 2013

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

Re: Juontonio Pinckney, et al v. Brock L. Fankhauser, et al.
Case No. 2013-000327
York County Consolidated Case No. 2010-CP-46-2326

Dear Mrs. Kitchings:

Please find enclosed/attached an original and six copies of the Notice of Motion and Motion by Appellants' counsel to extend the filing deadline on appellants' final brief, along with the required motion fee. I am requesting the extension to accommodate being out of office with my family during the unanticipated scheduling of a stroke-related medical procedure my father is having performed that will coincide with the existing deadline. I would appreciate leave to be with my family during the surgery, recovery, and anticipated return home September 25th through October 1, 2013.

I understand in review of SCACR 263(b) that extension is only by leave of the court, but am confirming that I have consulted with opposing attorneys in this appeal who have all indicated no objection to the relief I am seeking. I am requesting a ten (10) day extension.

Thank you for bringing this to the court's attention and I appreciate the court's consideration as well as the courtesies of opposing counsel.

With kind regards, I am

Respectfully,


J. Cameron Halford

JCH:krw
Enclosures/attachments
E-mail Distribution
cc: Brett Dressler, Esq.
cc: Curtis Dowling, Esq.

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SEP 24 2013

SC Court of Appeals

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P. John Freeman, Esquire

cc: Graham P. Powell, Esq.
cc: Brad Cranshaw, Esq.
cc: Mike Wilkes, Esq.
cc: J. Derham Cole, Esq.