

STATE OF SOUTH CAROLINA
In the Court of Appeals

70297

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge
Trial Court Case No. 2009-CP-22-1045

APPELLATE CASE NO. 2013-001644

John Steven Goodwin, Louise C. Goodwin, Thomas L. Puckett and Brenda C. Puckett, Robert Nahama and Jeanne E. Nahama, Thomas Holland and Sharon Louise Holland, Joyce K. Sobel, Robert W. Waruszewski, Richard N. Taylor, Robert K. Spillers (a/k/a Robert Spillers), and Deborah T. Spillers (a/k/a Deborah Spillers, Patrick A. DiAngelo and Deborah A. DiAngelo, Gary E. Owens and Joyce M. Owens, Fount L. Shults and Lynda M. Shults, and Dennis Ridgeway and Teresa Lynn Ridgeway,Appellants

v.

Landquest Development, LLC, Kyle V. Corkum, South Bay Properties, LLC, C. R. Thompson and Sons, LLC, Ronald L. Charlton, Bonnie N. Charlton, James R. Charlton and Bayside Property, Inc., the City of Georgetown, Hartford Casualty Insurance Company, Hartford Fire Insurance Company, and National Land Sales, Inc., f/k/a Source One Communities, LLC, a/k/a Source One Signature Communities.....Respondents

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

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SC Court of Appeals

Counsel for the Appellants hereby respectfully moves before this Court, pursuant to Rule 240(a), SCACR, for a thirty (30) day extension of time to file the Initial Brief and Designation of Matter to be included in the Record on Appeal. Co-counsel previously requested and received an extension of time to file Appellant's Initial Brief until November 6, 2013.

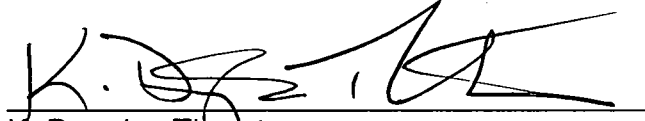
Appellants' undersigned counsel has been required to appear in, and prepare for, civil jury trials in the Court of Common Pleas for the 15th Judicial Circuit during the majority of the month of October and is therefore seeking an extension of time in the within matter. Appellants contend, therefore, that good cause exists for an extension of time to file their Initial Brief and Designation of Matter to be included in the Record on Appeal.

WHEREFORE, Appellants contend that this Appeal and the interests of justice will be served by granting Appellants a thirty (30) day extension of time within which to file their Initial Brief and Designation of Matter to be included in the Record on Appeal.

Accordingly, Appellants request the Court to enter an Order Enlarging the Time up and including December 6, 2013, to submit their Initial Brief and Designation of Matter to be included in the Record on Appeal.

Respectfully submitted:

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ATTORNEYS FOR APPELLANTS

November 4, 2013

Conway, SC

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
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Benjamin H. Culbertson, Circuit Court Judge
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v.

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CERTIFICATE OF SERVICE

I, Regina R. Cagle, as an employee of the Thornton Law Firm, LLC, certify that a copy of Appellants' Motion for Extension of Time to File Initial Brief and Designation of Matter, in the above captioned action was served upon all counsel of record on the 4th day of November, 2013, by mailing same to the following addresses:

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SC Court of Appeals

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Regina R. Cagle

November 4, 2013

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November 4, 2013

Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 116929
Columbia, South Carolina 29211

Re: John Goodwin, et al. v. Landquest Development, LLC, et al.
Appellate Case No.: 2013-001644

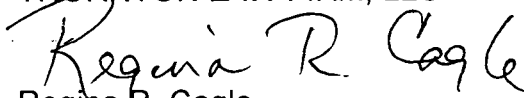
Dear Ms. Kitchings:

Enclosed herewith please find an original and one (1) copy of Appellants' Motion for Extension of Time to File Initial Brief and Designation of Matter and Certificate of Service in the above captioned matter. Also attached is this firm's check in the sum of \$25.00 to cover the filing fee. Upon filing, please forward a clocked copy to our office in the self-addressed, stamped envelope provided for your convenience.

With kind regards, I am

Yours very truly,

THORNTON LAW FIRM, LLC



Regina R. Cagle

Paralegal to K. Douglas Thornton

cc: John M. Leiter, Esq.
Charles T. Smith, Esq.
Joseph Kevin Qualey, Esq.
Ronald L. Richter, Jr., Esq.
Elise Freeman Crosby, Esq.
Lawrence Michael Hershon, Esq.
Andrew F. Lindemann, Esq.
Kristin G. Atkins, Esq.

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