

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

The Honorable S. Jackson Kimball, Master-in-Equity

Case No. 2011-CP-46-01595  
Appellate Case No. 2012-213727

70569

RECEIVED

DEC 03 2013

SC Court of Appeals

Crescent Resources, LLC,.....Respondent,

v.

J & J Properties of Lake Wylie, LLC,  
and Jerrold J. Pettus, Sr.,.....Appellants.

**MOTION FOR EXTENSION OF TIME**

Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, Appellants J & J Properties of Lake Wylie, LLC, and Jerrold J. Pettus, Sr., request an order granting Appellants a 30-day extension of time to file an initial brief and designation of matter. This request is being made due to counsel's workload and other personal and professional commitments. This is Appellants' second request for an extension of time.

Appellants' initial brief and designation of matter are currently due on Monday, December 9, 2013. If the request is granted, Appellants' initial brief and designation of matter will be due on January 8, 2014.

Counsel for Respondent consents to this request.

12-9-13  
1-8-14

SOWELL GRAY STEPP & LAFFITTE, LLC

By: \_\_\_\_\_



Tina Cundari  
1310 Gadsden Street  
Columbia, South Carolina 29201  
(803) 929-1400  
[tcundari@sowellgray.com](mailto:tcundari@sowellgray.com)

Attorneys for Appellants

December 3, 2013

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

RECEIVED

DEC 03 2013

The Honorable S. Jackson Kimball, Master-in-Equity **SC Court of Appeals**

Case No. 2011-CP-46-01595  
Appellate Case No. 2012-213727

Crescent Resources, LLC,.....Respondent,

v.

J & J Properties of Lake Wylie, LLC,  
and Jerrold J. Pettus, Sr.,.....Appellants.

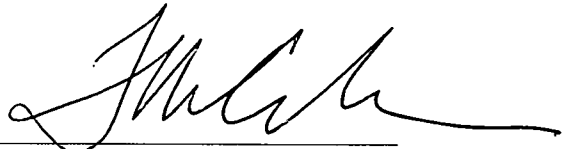
---

**PROOF OF SERVICE**

---

I certify that I have served the Motion for Extension of Time on William Mark White, Esquire, and Jeremy D. Melville, Esquire, counsel for Respondent, by electronic mail and by depositing a copy of the motion in the United States Mail, postage prepaid, on December 3, 2013, addressed to: William Mark White, Esquire, and Jeremy D. Melville, Esquire, Spencer & Spencer, PA, Post Office Box 790, Rock Hill, South Carolina 29731.

*[Signature page follows]*



---

Tina M. Cundari  
SOWELL GRAY STEPP & LAFFITTE, LLC  
1310 Gadsden Street  
Columbia, South Carolina 29201  
(803) 929-1400  
[tcundari@sowellgray.com](mailto:tcundari@sowellgray.com)

Attorneys for Appellant

Columbia, South Carolina  
December 3, 2013

December 3, 2013

RECEIVED

DEC 03 2013

SC Court of Appeals

**BY HAND-DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
Edgar Brown Building  
1205 Pendleton Street  
Columbia, South Carolina 29201

RE: *Crescent Resources, LLC, Respondent v. J&J Properties of Lake Wylie, LLC, and Jerrold H. Pettus, Sr., Appellants*  
Appellate Case No.: 2012-213727  
SGSL No.: 6587/1500

Dear Ms. Kitchings:

Enclosed are an original and seven (7) copies of Appellants' Motion for Extension of Time to file the initial brief in the above-referenced matter. Please file the original and return a filed-stamped copy to my office by our courier. Also enclosed is a check in the amount of \$25.00 for the filing fee.

By copy of this letter to opposing counsel, I am notifying them of my communication with the Court. As you will see in the motion, opposing counsel consents to the relief requested.

Thank you for your assistance in this matter and please contact me if you have any questions.

Very truly yours,



Tina M. Cundari

TMC:tc  
Enclosures

cc: William Mark White, Esquire (by Email and U.S. Mail)  
Jeremy D. Melville, Esquire (by Email and U.S. Mail)