

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

176528

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge  
Robert E. Watson, Master-in-Equity

**RECEIVED**

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Case No. 2011-CP-08-03412

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**SC Court of Appeals**

First Citizens Bank and Trust Company, Inc.,  
Successor-in-interest to the Federal Deposit Insurance  
Corporation, receiver of Georgian Bank.....Respondent,

v.

Goose Creek II, LLC, James C. Wallace a/k/a James C.  
Wallace, Sr., John S. Paulson a/k/a John Paulson, Jiri Jilich  
a/k/a Jiri Jilich, Jr., James K. Price, Eastwood Homes, Inc.,  
Charles Huff, as the Personal Representative of the Estate  
of Richard P. Huff, Jr., Seamon, Whiteside & Associates, Inc.,  
Monarch Plantation Homeowners' Association, Inc., ..... Defendants,

Of whom:  
Eastwood Homes, Inc., is .....Appellant.

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**MOTION FOR EXTENSION OF TIME**

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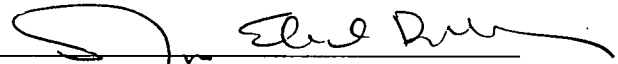
The undersigned, as counsel for the Appellant hereby moves for a ten (10) day extension of time to file its Return to Respondent's Motion to Dismiss, a copy of which is attached. This motion is based on counsel's present work load. This extension request is

not intended for purposes of delay, but rather to ensure that Appellant's return to motion is properly researched and prepared. Further, there would be no prejudice to the parties by an extension of time. Respondent's attorney has consented to this extension. By the undersigned's calculations the extension, if granted, would extend Appellants' deadline for filing its Return to Motion to Dismiss to December 12, 2013.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing of the Return to Motion to Dismiss to December 12, 2013.

November 27, 2013

Respectfully submitted,



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Pro Hac Vice

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Homes, Inc.

Other Counsel of Record:

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Company, Inc.

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Estate of Richard P. Huff, Jr.

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John S. Paulson a/k/a John  
Paulson, and Goose Creek II,  
LLC

James K. Price  
15 Poulnot Lane  
Charleston, SC 29401  
Defendant

Mr. Jiri Jilich  
c/o Mrs. Jane Jilich  
112 Bull Street Charleston, SC 29401  
Defendant

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a/k/a Jiri Jilich, Jr., James K. Price, Eastwood Homes, Inc.,  
Charles Huff, as the Personal Representative of the Estate  
of Richard P. Huff, Jr., Seamon, Whiteside & Associates, Inc.,  
Monarch Plantation Homeowners' Association, Inc., ..... Defendants,

Of whom:  
Eastwood Homes, Inc., is .....Appellant.

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**PROOF OF SERVICE**

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I certify that I have served the Appellant's Motion for Extension of Time for file a  
Return to Motion to Dismiss on the Respondent by depositing a copy in the United States  
Mail, postage prepaid, on November 27, 2013, addressed to the following:

Thomas Waring  
Christopher A. Ogiba  
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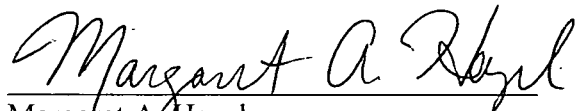
James K. Price  
15 Poulnot Lane  
Charleston, SC 29401  
Defendant

Mr. Jiri Jilich  
c/o Mrs. Jane Jilich  
112 Bull Street Charleston, SC 29401  
Defendant

James C. Adams, II, Esquire  
Brooks Pierce  
2000 Renaissance Plaza  
230 North Elm Street  
Greensboro, NC 27401

November 27, 2013

Respectfully submitted,

A handwritten signature in cursive script that reads "Margaret A. Hazel". The signature is written in black ink and is positioned above a horizontal line.

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