

THE SOUTH CAROLINA COURT OF APPEALS

LNV Corporation,

v.

Affordable Hospitality
Group-Anderson, LLC, Diversified
Capital Investment Group, LLC, and Jay Berlye,
Anderson County, South Carolina, and the State
of South Carolina, Defendants,

Of Whom Affordable Hospitality Group-Anderson, LLC,
Diversified Capital Investment Group, LLC; and Jay
Berlye are the Appellants.

Appellate Case No. 2013-002341

The Honorable Alexander S. Macaulay
Anderson County
Trial Court Case No. 2011CP0402728

MOTION FOR EXTENSION OF TIME

The Appellants, through undersigned counsel, request an extension of time for filing and service of the Appellants' Initial Reply Brief and Designation of Matter. Presently, the period such filing and service ends on February 6, 2014, to which Appellants respectfully request that an additional ten days be added.

January 29, 2014



Ronald M. Childress
7033 Glengarry Drive
Columbia, SC 29209
(803) 776-8567
Attorney for Appellants

Respondent,

71138

Appellants.

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SC Court of Appeals

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CERTIFICATE OF SERVICE

The undersigned certifies that the Motion for Extension of Time was served upon all counsel of record this 29th day of January 2014, by depositing copies of same in the United States mail, postage prepaid, and addressed as follows:

Mr. A. Mattison Bogan
Nelson, Mullins, Riley and Scarborough LLP
1320 Main Street/17th Floor
Columbia, SC 29201
Attorneys for Plaintiff
LNV Corporation

Mr. Michael S. Pitts
Collins and Lacy
110 W. North Street, Suite 100
Greenville, SC 29601
Attorney for Defendant
Anderson County, South Carolina

Mr. Sean G. Ryan
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P.O. Box 12265
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January 29, 2014

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: LNV Corporation v. Affordable Hospitality Group–Anderson, LLC; Diversified Capital Investment Group, LLC; Jay Berlye; Anderson County, South Carolina and the State of South Carolina,
of Whom Affordable Hospitality Group–Anderson, LLC; Diversified Capital Investment Group, LLC, and Jay Berlye are the Appellants.
Appellate Case No. 2013-002341

Dear Ms. Kitchings,

I have received the Initial Respondent Brief of Respondent LNV Corporation. Under Rules 208 and 209, the Appellant's Initial Reply Brief and (supplemental) Designation of Material should be served and filed no later than February 6, 2014. This letter respectfully requests an extension of the filing date until February 16th (more precisely, Monday February 17th).

In addition to other workload and teaching responsibilities at the USC Law School, this case presents a somewhat unique situation for me. My clients are located in other states requiring detailed coordination of motions, briefs and other court filings. An additional challenge has been presented by the current inclement weather, which has even delayed filing this motion. Thus, it may not be possible to finalize the Reply Brief within the eight days remaining.

This is the first request for extension submitted by the Appellants. A check for Twenty Five Dollars (\$25.00) is enclosed to cover the required motion fee. Also enclosed is an additional copy of the Motion with a postage-paid, self-addressed envelope. Please clock this additional copy and return it in the envelope provided.

Thank you in advance for your assistance.

Sincerely,


Ronald M. Childress

Enclosure

cc: Mr. A. Mattison Bogan
Mr. Michael S. Pitts
Mr. Sean G. Ryan

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JAN 31 2014

SC Court of Appeals