

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

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SC Court of Appeals

John Steven Goodwin, Louise C. Goodwin, Thomas L. Puckett and Branda 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 South One Signature Communities Respondents

**RESPONDENTS HARTFORD CASUALTY INSURANCE COMPANY'S AND
HARTFORD FIRE INSURANCE COMPANY'S MOTION FOR EXTENSION OF
TIME TO FILE INITIAL BRIEF**

NOW COMES Respondents Hartford Casualty Insurance Company and Hartford Fire Insurance Company ("Hartford Defendants"), pursuant to 240(a), SCACR, and

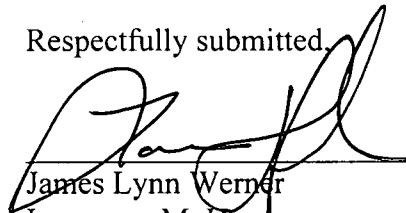
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respectfully request an extension of time of thirty (30) days within which to file their Initial Brief.

As a result of Respondent Hartford Defendants' counsels' work schedule and the timing of the due date falling just after the December holidays, Hartford Defendants respectfully contend that good cause exists for an extension of time to file their Initial Brief as Respondents. In addition, Appellants requested and received two extensions to their Initial Brief deadline.

WHEREFORE, Hartford Defendants respectfully request an order granting an extension of thirty (30) days to file their Initial Brief, up to and including February 5, 2014.

Respectfully submitted,



James Lynn Werner
Lawrence M. Hershon
Parker Poe Adams & Bernstein LLP
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ATTORNEYS FOR RESPONDENTS
HARTFORD CASUALTY INSURANCE
COMPANY AND HARTFORD FIRE
INSURANCE COMPANY

January 3, 2014
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA
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v.

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PROOF OF SERVICE

The undersigned hereby certifies that on January 3, 2014, he served the foregoing **RESPONDENT HARTFORD'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF** on all counsel of record by placing a copy of it in the United States Mail, first class postage prepaid, addressed as follows:

K. Douglas Thornton, Esq.
Thornton Law Firm, LLC
1025 Third Avenue
Conway, SC 29526

John M. Leiter, Esq.
Law Offices of John M. Leiter, PA
1203 48th Avenue North, Suite 109
Myrtle Beach, SC 29577

Charles T. Smith, Esq.
608 Cypress Street
Georgetown, SC 29440

Joseph Kevin Qualey, Esq.
23 Broad Street
Charleston, SC 29401

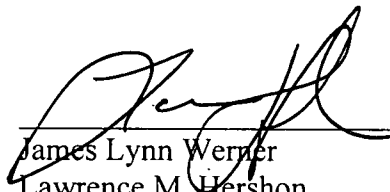
Ronald L. Richter, Jr., Esq.
18 Broad Street, Mezzanine
Charleston, SC 29401

Elise Freeman Crosby, Esq.
405 Dozier Street
Georgetown, SC 29440

Andrew F. Lindemann, Esq.
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Columbia, SC 29202

Kristin G. Atkins, Esq.
Donald G. Hunt, Jr., Esq.
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Fuquay Varina, NC 27526

[SIGNATURE BLOCK APPEARS ON FOLLOWING PAGE.]



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ATTORNEYS FOR RESPONDENTS
HARTFORD CASUALTY INSURANCE COMPANY
AND HARTFORD FIRE INSURANCE COMPANY

January 3, 2014
Columbia, South Carolina



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Charleston, SC
Charlotte, NC
Columbia, SC
Raleigh, NC
Spartanburg, SC

January 3, 2014

Via Hand Delivery

The Honorable Kenneth A. Richstad
Clerk, Court of Appeals
1015 Sumter Street
Columbia, SC 29211

***Re: John Steven Goodwin et al. v. Landquest Development, LLC et al.
Trial Court Case No. 2009-CP-22-1045
Appellate Case No. 2013-001644***

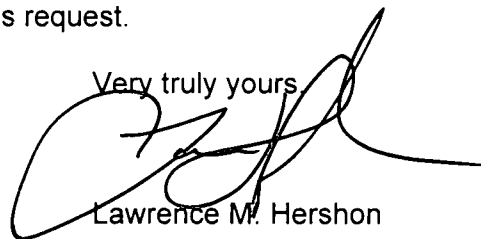
Dear Mr. Richstad:

Enclosed please find the original and seven copies of Respondents Hartford Casualty Insurance Company and Hartford Fire Insurance Company's Motion for Extension of Time to File Initial Brief in the above-referenced case, along with a check for \$25.00 for the requisite filing fee. Please return a file-stamped copy of the motion to my courier.

By copy of this letter, I am today serving the motion on counsel for Appellants and the other Respondents.

Thank you for your attention to this request.

Very truly yours



Lawrence M. Hershon

LMH:dmc
Enclosure

cc: K. Douglas Thornton, Esq. (w/enc.) – via U.S. Mail
John M. Leiter, Esq. (w/enc.) – via U.S. Mail
Charles T. Smith, Esq. (w/enc.) – via U.S. Mail
Joseph Kevin Qualey, Esq. (w/enc.) – via U.S. Mail
Ronald L. Richter, Jr., Esq. (w/enc.) – via U.S. Mail
Elise Freeman Crosby, Esq. (w/enc.) – via U.S. Mail
Andrew F. Lindemann, Esq. (w/enc.) – via U.S. Mail
Kristin G. Atkins, Esq. (w/enc.) – via U.S. Mail

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