

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

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

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70938

APPELLATE CASE NO. 2013-001644

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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

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APPELLANTS' MOTION FOR  
EXTENSION OF TIME TO FILE  
REPLY BRIEF

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JAN 13 2014

**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 their Reply Brief to

1st  
(moot)

the Initial Brief of Respondents Ronald L. Charlton, Bonnie N. Charlton, James R. Charlton and Bayside Property, Inc. in the within matter.

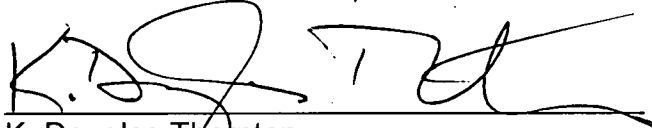
Appellants' undersigned counsel received said Respondents' Initial Brief on January 9, 2014, thereby rendering his Response due on January 19, 2014. Appellants' counsel's schedule will confirm that during the week of January 13, 2014, he must appear in Circuit Court in Charleston County for a contested case, Family Court in Horry County for two different contested cases, and for two separate Magistrate Court cases in Horry County. Additionally, during the week of January 20, 2014, Appellants' counsel has a Brief due in a Circuit Court case in Horry County; that he must appear in General Sessions Court on Tuesday, January 21<sup>st</sup> and has a Brief due in an Employment Security Commission matter that same day, together with two depositions scheduled for Thursday, January 23, 2014. Appellants' counsel also represents the Plaintiffs in a Common Pleas case that is scheduled third for trial during the week of January 27, 2014, with a Summary Judgment Motion in a separate case scheduled that same date. Appellants' counsel 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 Reply Brief in this matter.

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 Reply Brief to Respondents' Initial Brief.

Accordingly, Appellants request the Court to enter an Order Enlarging the Time up and including February 18, 2014, to submit their Reply Brief to Respondents' Initial Brief.

Respectfully submitted:

THORNTON LAW FIRM, LLC



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ATTORNEYS FOR APPELLANTS

January 10, 2014

Conway, SC

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge  
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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

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CERTIFICATE OF SERVICE

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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 Reply Brief in the above captioned action was served upon all counsel of record on the 10th day of January 10, 2014, by mailing same to the following addresses:

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JAN 13 2014

**SC Court of Appeals**

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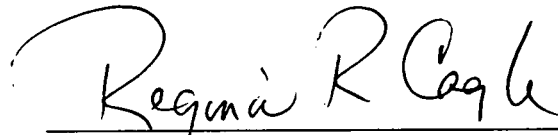
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Regina R. Cagle

January 10, 2014

Conway, SC

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January 10, 2014

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

Re: John Steven Goodwin, et al. vs. 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' Reply Brief and a Certificate of Service in the above captioned matter. Upon filing, 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.  
Andrew F. Lindermann, Esq.  
Kristin G. Atkins, Esq.  
Donald G. Hunt, Jr., Esq.  
Joseph Kevin Qualey, Esq.  
Ronald L. Richter, Jr., Esq.  
Elise Freeman Crosby, Esq.  
Lawrence Michael Hershon, Esq.

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