

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

W. Jeffrey Young, Circuit Court Judge

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Case No.: 2011-CP-40-4068

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MAR 03 2014

SC Court of Appeals

Denise Wright,

Appellant,

vs.

PRG Real Estate Management,  
Inc.; Franklin Pineridge Associates;  
Karen Campbell Individually, and in  
her Representative Capacity as an  
Agent of PRG Real Estate Management

Respondents.

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**MOTION FOR EXTENSION OF TIME TO FILE  
RESPONDENTS' MOTION TO STRIKE**

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TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA  
COURT OF APPEALS:

Respondents respectfully move this Court for an Order granting them an extension of time in which to file and serve a Motion to Strike.

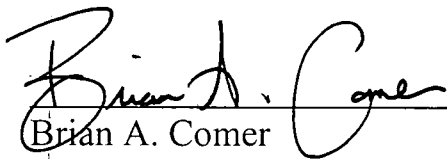
Counsel for Respondents have been conscientious in their efforts consider and to prepare a Motion to Strike; however, because of the complexity of many of the legal issues attendant in this case, counsel projects they will require additional

time to complete the analysis. The current deadline is March 3, 2014. Respondents respectfully move for a ten (10) day extension, which would now make the deadline March 13, 2014.

Counsel for Respondents consulted with counsel for Appellant, Jordan C. Calloway, and obtained consent to this motion.

Respondents greatly appreciate the Court's time, attention and assistance with regard to this request.

Respectfully submitted,  
COLLINS & LACY, P.C.

By:   
Brian A. Comer  
[bcomer@collinsandlacy.com](mailto:bcomer@collinsandlacy.com)  
1330 Lady Street, Sixth Floor (29201)  
Post Office Box 12487  
Columbia, South Carolina 29211  
(803) 256-2660  
(803) 771-4484 (facsimile)

March 3, 2014  
Columbia, South Carolina

*Counsel for Respondents.*



ATTORNEYS AT LAW  
Brian A. Comer | Direct Dial: (803) 255-0446 | E-Mail: bcomer@collinsandlacy.com

March 3, 2014

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MAR 03 2014

**VIA HAND-DELIVERY**

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
Clerk of Court  
Post Office Box 11629  
Columbia, SC 29211

SC Court of Appeals

**Re: Denise Wright v. PRG Real Estate Management, Inc., Franklin Pineridge Associates, Karen Campbell Individually and in her Representative Capacity  
Civil Action No.: 2011-CP-40-04068  
Claim No.: 684-259253  
C&L File No.: 000001-02055**

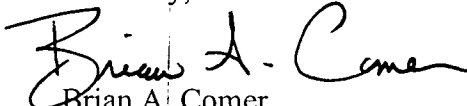
Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of Respondents' Motion for Extension of Time to File Respondents' Motion to Strike in the above-referenced matter. I am also enclosing herewith a check in the amount of \$25.00 for the required filing fee. Please return the filed copies of each to me via my courier.

By copy of this letter, a copy of same, with enclosures, is being served upon all counsel.

With kindest regards, I am

Sincerely,

  
Brian A. Comer

BAC:lcc

Enclosures

cc: S. Randall Hood, Esquire  
Jordan C. Calloway, Esquire  
Deborah G. Casey, Esquire  
E. Wayne Ridgeway, Esquire

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**SC Court of Appeals**

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Respondents.

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**PROOF OF SERVICE**

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I HEREBY CERTIFY THAT I SERVED THE Motion for Extension of Time to File Respondents' Motion to Strike upon all parties, by placing a copy in the United States mail, postage prepaid, to all counsel of record on March 3, 2014, addressed to the following:


**Counsel Served:**

E. Wayne Ridgeway, Jr., Esquire  
907 Elwood Avenue  
Columbia, SC 29211

and

S. Randall Hood, Esquire  
Jordan C. Calloway, Esquire  
Deborah G. Casey, Esquire  
McGowan, Hood & Felder, LLC  
1539 Health Care Drive  
Rock Hill, SC 29732

Respectfully submitted,  
COLLINS & LACY, P.C.

By:   
Brian A. Comer  
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*Counsel for Respondents.*

**PROOF OF SERVICE – MOTION  
FOR EXTENSION OF TIME TO  
FILE RESPONDENTS’ MOTION  
TO STRIKE**

March 3, 2014  
Columbia, South Carolina