

STATE OF SOUTH CAROLINA  
IN THE  
SUPREME COURT

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S.C. SUPREME COURT

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Appeal from the Court of Common Pleas  
For Georgetown County  
Honorable John M. Milling, Circuit Judge  
Civil Action No.: 2006-CP-22-0914  
*South Carolina Court of Appeals*  
392 S.C. 160, 708 S.E.2d 218 (Ct.App. 2011)

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AJG Holdings, LLC; Stalvey Holdings, LLC;  
David Croyle; Linda Croyle; Jean C. Abbott;  
Linda T. Courtney; Sumter L. Langston; Diane  
Langston; Carl B. Singleton, Jr.; Virginia M.  
Owens, and Stoney Harrelson,

Respondents,

v.

Levon Dunn; Pamela S. Dunn; and  
Helen Sasser,

Petitioners.

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MOTION FOR EXTENSION OF TIME (2<sup>nd</sup>) TO FILE  
BRIEF ON CERTIORARI AND APPENDIX

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*Attorneys for the Petitioners,  
Levon Dunn, Pamela S. Dunn,  
and Helen Sasser*

TO: THE HONORABLE JUSTICES OF THE SOUTH CAROLINA SUPREME COURT:

COMES NOW the Petitioners, Levon Dunn, Pamela S. Dunn, and Helen Sasser, pursuant to Rule 240 of the South Carolina Appellate Court Rules, and respectfully requests this Supreme Court to grant them a thirty-day (30) extension of time in which to file their Brief on Certiorari and the additional copies of the Appendix in this matter.

The basis for this motion is the undersigned counsel's present involvement in a number of other appellate and trial matters at this time. In addition, as this Supreme Court is aware, one of the Petitioners – Helen Sasser – passed away on 13 January 2014 (just before certiorari was granted herein) and her Estate will need to be substituted as the applicable party by motion.

Based upon the undersigned's information, the Petitioners' Brief on Certiorari and the additional copies of the Appendix are currently due on or before Wednesday, 26 March 2014. Consequently, anticipating this Supreme Court's favorable reception to and subsequent grant of this extension motion, the Petitioners' Brief on Certiorari and the additional copies of the Appendix would then be due on or before Friday, 25 April 2014.

Finally, the Petitioners' respectfully request this Supreme Court to hold the briefing time in abeyance until such time as this motion may be considered and ruled upon.

Respectfully submitted:

NEXSEN PRUET, LLC

By: 

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*Attorneys for the Petitioners,  
Levon Dunn, Pamela S. Dunn,  
and Helen Sasser*

Charleston, South Carolina

19 March 2014

NPCHAR1:1282665.1-MO-(SPG) 039489-00001

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**PROOF OF SERVICE for the  
MOTION FOR EXTENSION OF TIME (2<sup>nd</sup>) TO FILE  
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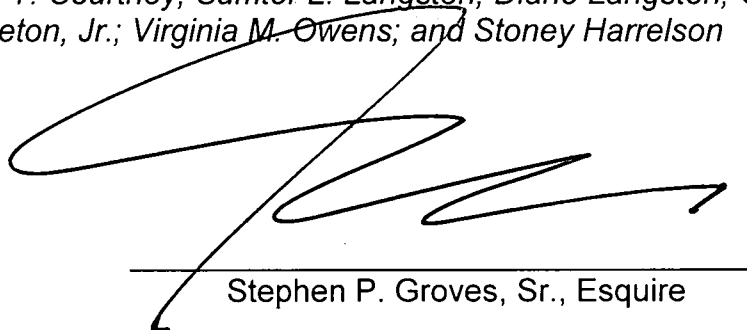
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*Attorneys for the Petitioners,  
Levon Dunn, Pamela S. Dunn,  
and Helen Sasser*

I, Stephen P. Groves, Sr., Esquire, hereby certify that on 19 March 2014, I served one copy of the **Motion for Extension of Time in Which to File Brief on Certiorari and Appendix** submitted by the Petitioners, Levon Dunn, Pamela S. Dunn, and Helen Sasser, on counsel for the Respondents via the United States Mail, postage pre-paid, and addressed as follows:

Jack M. Scoville, Jr., Esquire  
1001 Front Street  
Georgetown, South Carolina 29442

*Attorney for the Respondents,  
AJG Holdings, LLC; Stalvey Holdings, LLC; David Croyle; Linda Croyle; Jean C. Abbott; Linda T. Courtney; Sumter L. Langston; Diane Langston; Carl B. Singleton, Jr.; Virginia M. Owens; and Stoney Harrelson*



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Stephen P. Groves, Sr., Esquire

Charleston, South Carolina  
19 March 2014

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