

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

17719

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge  
Robert E. Watson, Master-in-Equity

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MAR 28 2014

Case No. 2011-CP-08-03412

SC Court of Appeals

First Citizens Bank and Trust Company, Inc.,  
Successor-in-interest to the Federal Deposit Insurance  
Corporation, receiver of Georgian Bank..... Respondent,

v.

Goose Creek II, LLC, James C. Wallace a/k/a James C.  
Wallace, Sr., John S. Paulson a/k/a John Paulson, Jiri Jilich  
a/k/a Jiri Jilich, Jr., James K. Price, Eastwood Homes, Inc.,  
Charles Huff, as the Personal Representative of the Estate  
of Richard P. Huff, Jr., Seamon, Whiteside & Associates, Inc.,  
Monarch Plantation Homeowners' Association, Inc., ..... Defendants,

Of whom:  
Eastwood Homes, Inc., is ..... Appellant.

**MOTION FOR EXTENSION OF TIME**

The undersigned, as counsel for the Appellant hereby moves for a thirty (30) day extension of time to file its Initial Brief. This motion is based on counsel's present work load. This extension request is not intended for purposes of delay, but rather to ensure

that Appellant's brief is properly researched and prepared. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculations the extension, if granted, would extend Appellants' deadline for filing its Initial Brief to May 6, 2014.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing of the Initial Brief to May 6, 2014.

March 25, 2014

Respectfully submitted,



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Homes, Inc.

Other Counsel of Record:

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Paulson, and Goose Creek II,  
LLC

James K. Price  
15 Poulnot Lane  
Charleston, SC 29401  
Defendant

Mr. Jiri Jilich  
c/o Mrs. Jane Jilich  
112 Bull Street Charleston, SC 29401  
Defendant

IN THE STATE OF SOUTH CAROLINA  
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Charles Huff, as the Personal Representative of the Estate  
of Richard P. Huff, Jr., Seamon, Whiteside & Associates, Inc.,  
Monarch Plantation Homeowners' Association, Inc., ..... Defendants,

Of whom:  
Eastwood Homes, Inc., is .....Appellant.

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**PROOF OF SERVICE**

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I certify that I have served the Appellant's Motion for Extension of Time for  
filing Appellant's Initial Brief on following by depositing a copy in the United States  
Mail, postage prepaid, addressed to the following:

Thomas Waring  
Christopher A. Ogiba  
Lesley A. Firestone  
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LLC

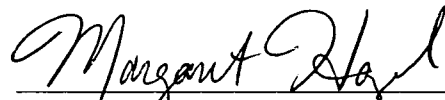
James K. Price  
15 Poulnot Lane  
Charleston, SC 29401  
Defendant

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112 Bull Street Charleston, SC 29401  
Defendant

James C. Adams, II, Esquire  
Brooks Pierce  
2000 Renaissance Plaza  
230 North Elm Street  
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March <sup>26</sup>~~23~~, 2014

Respectfully submitted,



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 Sarah Taylor Cassidy  
 Margaret "Meg" Hazel  
 Billy C. Coleman (Ret.)

March 25, 2014

The Honorable Jenny Abbott Kitchings  
 Clerk of Court, SC Court of Appeals  
 PO Box 11629  
 Columbia, SC 29211

Re: First Citizens Bank and Trust Company, Inc., successor-in-interest to the Federal Deposit Insurance Corporation, receiver of Georgian Bank vs. Goose Creek II, LLC, James C. Wallace a/k/a James C. Wallace, Sr., John S. Paulson a/k/a John Paulson, Jiri Jilich a/k/a Jiri Jilich, Jr., James K. Price, Eastwood Homes, Inc., Charles Huff, as the Personal Representative of the Estate of Richard P. Huff, Jr., Seamon, Whiteside & Associates, Inc., Monarch Plantation Homeowners' Association, Inc.  
 Case No. 2011-CP-08-03412

Dear Ms. Kitchings:

Please find enclosed the following:

- 1- an original and six copies of Respondent's Motion for Extension for the court, pursuant to SCRAP 240, certificate of service attached;
- 2- one copy to be clocked and returned;
- 3- a self-addressed, stamped envelope for return; and
- 4- \$25.00 filing fee

By copy of this letter via U.S. Mail first class, I am serving counsel of record with the same.

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MAR 28 2014

1700 Sunset Boulevard, West Columbia SC 29169 | PO Box 5709, West Columbia SC 29171  
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The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
March 25, 2014  
Page Two

Thank you very much for your assistance with this filing.

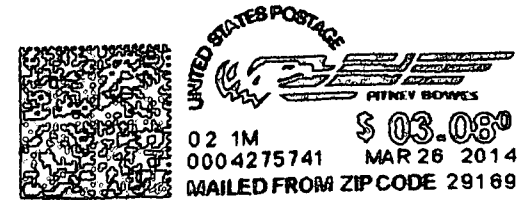
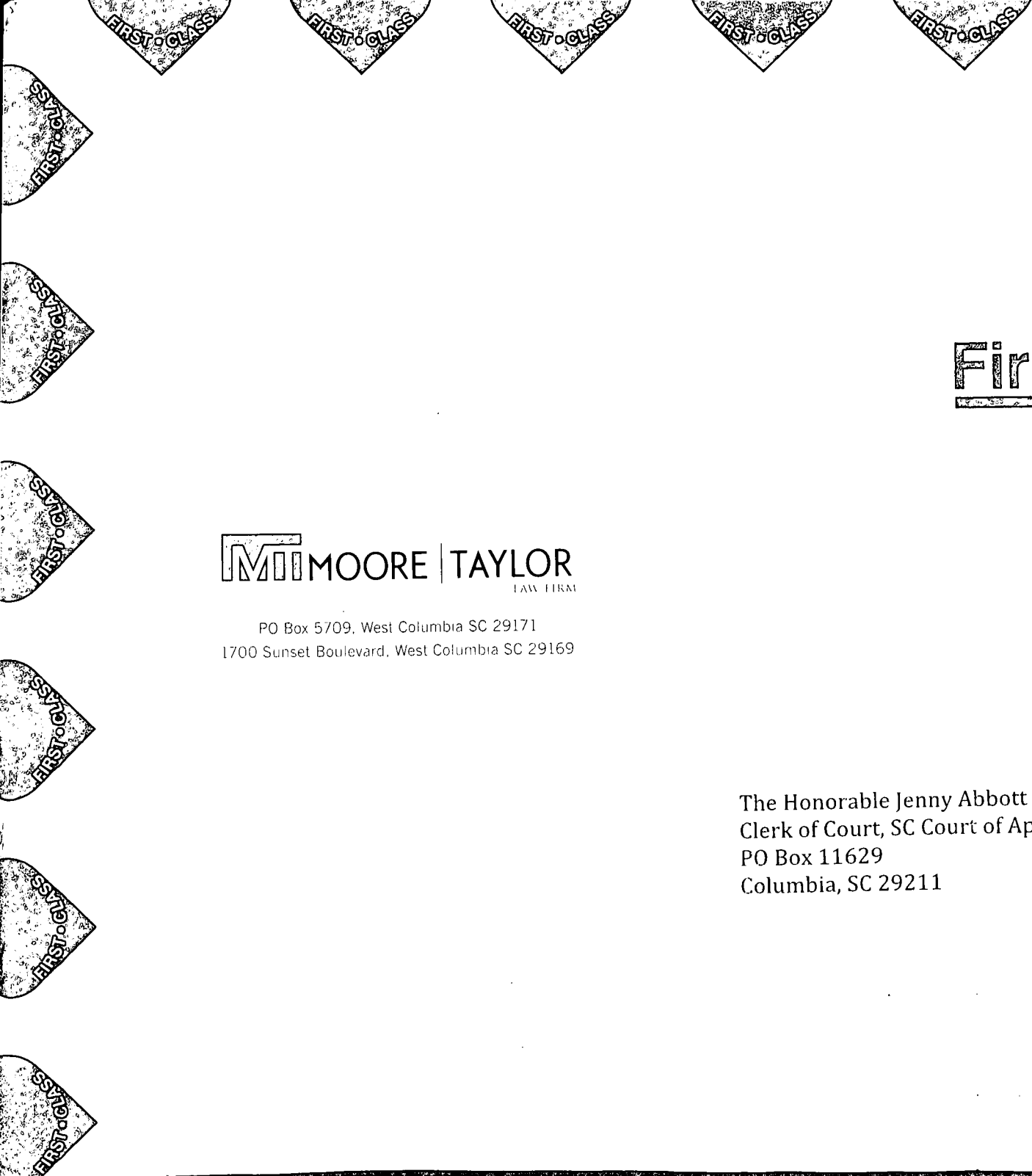
Best regards,

A handwritten signature in cursive script that reads "Meg Hazel". The signature is written in black ink and is positioned above the printed name.

Meg Hazel

Enclosures

cc: Thomas Waring, Esquire (via U.S. Mail)  
Christopher A. Ogiba, Esquire (via U.S. Mail)  
Keating L. Simons, III, Esquire (via U.S. Mail)  
Maria E. Kiehling, Esquire (via U.S. Mail)  
David Popowski, Esquire (via U.S. Mail)  
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James K. Price (via U.S. Mail)  
Jiri Jilich c/o Jane Jilich (via U.S. Mail)



**First Class Mail**

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
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Columbia, SC 29211



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