

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY

R. Lawton McIntosh, Circuit Court Judge

171766

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Circuit Court Civil Action No: 2012-CP-04-00041  
Appellate Case No: 2013-001518

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Harold P. Threlkeld d/b/a Harold P. Threlkeld, Attorney at Law .....Plaintiff,

v.

Lyman Warehouse, LLC, Lyman Pacific, LLC, Mills Demolition,  
LLC, Susan C. Stanley, Peter M. Stanley and Donald J. McWhirter.....Defendants

Of Whom Lyman Warehouse, LLC is the .....Appellant,

Of Whom Donald J. McWhirter is the..... Respondent.

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**RESPONDENT'S MOTION FOR EXTENSION OF TIME**

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Respondent hereby moves for an additional thirty-day (30) extension of time in which to serve his Initial Brief and Designation of matter to be included in the Record on Appeal which is currently due on or before April 7, 2014.

Counsel for Respondent has several out-of-state depositions taking place the week of April 7<sup>th</sup> which will require extensive preparation and the introduction of multiple exhibits. Due to an upcoming Mediation and the multiple witnesses involved, counsel is unable to request that the depositions be continued. Counsel apologizes for any inconvenience and respectfully requests the court grant Respondent a continuance of thirty (30) days. Counsel assures the court no additional extensions will be requested.

Counsel for Respondent has consulted with Cal Pruitt, attorney for Appellant, and he has no objection to the continuance.

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**SC Court of Appeals**

The Respondent asks that the deadline for serving and filing the Reply Brief and Designation be held in abeyance until such time as the Court rules upon this Motion.

**RIKARD & PROTOPAPAS, LLC**



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Peter D. Protopapas, SCB #68304

Email: [pdp@rplegalgroup.com](mailto:pdp@rplegalgroup.com)

1329 Blanding Street

Post Office Box 5640 (29250)

Columbia, South Carolina 29201

Telephone: 803.978.6111

Facsimile: 803.978.6112

*Attorneys for Respondent, McWhirter*

April 1, 2014

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Of Whom Donald J. McWhirter is the..... Respondent.

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**PROOF OF SERVICE**

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I, Jo-Elaine Boyd, a paralegal at Rikard & Protopapas, certify that I have served a true and correct copy of Respondent's Motion for Extension of Time on the attorneys for Appellant, Lyman Warehouse, LLC, and upon all parties involved on the 1<sup>st</sup> day of April, 2014, by mailing same by regular US Mail and email to:

Harold P. Threlkeld, 213 E Calhoun St, Anderson, SC 29621  
Fax 864-226-1685; [hptatty@bellsouth.net](mailto:hptatty@bellsouth.net); Attorney for Plaintiff

J. Calhoun Pruitt, Jr., 101 N Murray Avenue, Anderson, SC 29625  
Fax: 864-224-8711; [Tammygoff@pruittandpruitt.com](mailto:Tammygoff@pruittandpruitt.com); Attorney for  
Defendant/Respondent, Lyman Warehouse

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APR 01 2014

**SC Court of Appeals**

and by U.S. Mail only to:

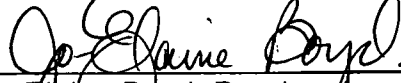
Peter Stanley, 155 River Place, Suite 202, Greenville, SC 29601

Susan Stanley, 155 River Place, Suite 202, Greenville, SC 29601

Mills Demolition, 155 River Place, Suite 202, Greenville, SC 29601

Lyman Pacific, 155 River Place, Suite 202, Greenville, SC 29601

**RIKARD & PROTOPAPAS, LLC**

A handwritten signature in cursive script that reads "Jo-Elaine Boyd". The signature is written in black ink and is positioned above a horizontal line.

Jo-Elaine Boyd, Paralegal  
[jboyd@rplegalgroup.com](mailto:jboyd@rplegalgroup.com)

April 1, 2014



**Rikard & Protopapas, LLC**

Attorneys and Counselors at Law

ROBERT G. RIKARD  
rgr@rplegalgroup.com

PETER D. PROTOPAPAS  
pdp@rplegalgroup.com

ALLYSON C. RIKARD  
acarbaugh@rplegalgroup.com

CHARLES E. USRY  
cusry@rplegalgroup.com

1329 Blanding Street  
Columbia, SC 29201

Post Office Box 5640  
Columbia, SC 29250

tel: 803.978.6111  
fax: 803.978.6112  
web: rplegalgroup.com

April 1, 2014

Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Calhoun Building  
1015 Sumter Street  
Columbia, SC 29211

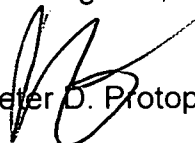
Re: Harold P. Threlkeld d/b/a Harold P. Threlkeld Attorney at Law vs. Lyman Warehouse, LLC, Lyman Pacific, LLC, Mills Demolition, LLC, Susan C. Stanley, Peter M. Stanley, and Donald J. McWhirter  
Appellate Case No: 2013-001518

Dear Ms. Kitchings:

Enclosed please find Respondent's Motion for Extension of Time for an additional thirty (30) days to serve and file Respondent's Initial Brief and Designation of matter to be included in the Record on Appeal.

I have enclosed my firm check in the amount of \$25.00 representing the filing fee for this extension request.

Best regards,

  
Peter D. Protopapas

PDP/jb  
Encls.

cc: J. Calhoun Pruitt, Jr., Esq.  
Harold P. Threlkeld, Esq.  
J. Christopher Pracht, Esq.  
Lyman Pacific, LLC  
Mills Demolition, LLC  
Susan C. Stanley  
Peter M. Stanley

**RECEIVED**

APR 01 2014

**SC Court of Appeals**