

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

APR 09 2014

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

**SC Court of Appeals**

Edward W. Miller, Presiding Judge

71834

Appellate Case No. 2013-001645  
(Trial Court Case No. 2013-CP-23-1833)

D& C Builders, Inc. ....Appellant,

v.

Richard M. Buckley and Wells Fargo National Association, Defendants,  
And Richard M. Buckley, Third-Party Plaintiff,

v.  
Scott Dodenhoff, Third-Party Defendant

Of whom Richard M. Buckley is the .....Respondent.

RESPONDENT'S MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF and DESIGNATION OF MATTER

Pursuant to Rule 240, SCACR, Respondent, Richard M. Buckley, hereby requests that the Court grant Respondent a thirty (30) day extension in which to file its Initial Brief and Designation of Matter in the above captioned matter. Currently, Respondent's Initial Brief is due on or before April 9, 2014. Counsel for Respondent believes that the requested extension will neither prejudice the parties nor unduly delay this appeal. Counsel for Respondent is making this request because of ongoing settlement negotiations in this matter and counsel for Respondent has had several hearings in various cases during

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the months of March and April.

It is further requested that all time be held in abeyance during the pendency of this motion.

No memorandum in support of this motion is being filed as it is counsel's belief that such memorandum would not aid the Court in ruling on the motion.

Respectfully Submitted,

April 8<sup>th</sup>, 2014



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M. Stokely Holder (SC Bar # 73892)  
KENISON, DUDLEY & CRAWFORD, LLC  
704 East McBee Avenue  
Greenville, SC 29601  
Ph. (864) 242-4899  
Fax (864) 242-4844

Attorney for Respondent

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v.  
Scott Dodenhoff, Third-Party Defendant

Of whom Richard M. Buckley is the ..... Respondent.

PROOF OF SERVICE

The undersigned hereby certifies that a true copy of the Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter in the above-referenced case has been served on all parties of record by electronic mail and by mailing a copy of same in the United States mail, first-class postage prepaid this 8<sup>th</sup> day of April, 2014, addressed as follows:

Brian A. Martin, Esquire  
Brian A. Martin, LLC  
212 Trade Street  
Greer, SC 29651  
*Attorney for Appellant*



Laurie Warren, Legal Assistant  
Kenison, Dudley & Crawford, LLC  
704 East McBee Avenue  
Greenville, SC 29601  
PH: (864) 242-4899 FAX: (864) 242-4844

KENISON, DUDLEY & CRAWFORD, LLC

A T T O R N E Y S   A T   L A W

KEVEN K. KENISON  
(1964-2013)

THOMAS E. DUDLEY, III  
Practicing Attorney in South Carolina and North Carolina

JOHN T. CRAWFORD, JR.  
Practicing Attorney in South Carolina

M. STOKELY HOLDER  
Practicing Attorney in South Carolina

TOWNES B. JOHNSON, III  
Practicing Attorney in South Carolina

F. LEE PRICKETT, III  
Practicing Attorney in South Carolina

April 8, 2014

Sent Via Federal Express

Hon. Jenny Abbott Kitchings  
Clerk of Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: *D&C Builders, Inc. v. Richard M. Buckley, et al.*  
*Of Whom Richard M. Buckley is the Respondent*  
*Appeal from Greenville County*  
C.A. No.: 2013-CP-23-1833  
Appellate Case No.: 2013-001645

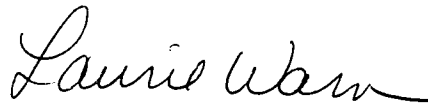
To Whom It May Concern:

Please find enclosed the original and six (6) copies of Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter, with Proof of Service in the above referenced matter. Also enclosed is our check in the sum of \$25.00 as and for the filing fee. By copy of this letter, we are serving one copy of each upon all counsel of record.

Thank you for your assistance in this matter and please do not hesitate to contact our office if you have any questions.

Very truly yours,

KENISON, DUDLEY & CRAWFORD, LLC



Laurie Warren  
Legal Assistant

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SC Court of Appeals

/lkw

Enclosures

cc: Brian A. Martin, Esq.

GREENVILLE  
704 East McBee Avenue ▪ Greenville, South Carolina 29601  
Phone 864.242.4899 ▪ Fax 864.242.4844

CHARLESTON  
534 B Oristo Ridge ▪ Edisto Beach, South Carolina 29438  
Phone 843.869.1000

ATLANTA  
1130 Hurricane Shoals Road ▪ Suite 600 ▪ Lawrenceville, Georgia 30043  
Phone 770.513.6400 ▪ Fax 770.518.6577