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SC Court of Appeals

172085

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

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

Appellate Case No. 2013-002378

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 and Designation of Matter. This motion is based on the parties in this matter are currently working together in settlement negotiations and


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are very close to accomplishing the same. 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 and Designation of Matter to June 4, 2014.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing of the Initial Brief and Designation of Matter to June 4, 2014.

May 2, 2014

Respectfully submitted,



James Edward Bradley
Margaret "Meg" Hazel
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Homes, Inc.

Other Counsel of Record:

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John S. Paulson a/k/a John
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

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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.

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time for
filing Appellant's Initial Brief and Designation of Matter 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
Moore & Van Allen
P. O. Box 22828
Charleston, SC 29413-2828
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Attorney for Charles Huff, as the
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a/k/a John Paulson, and Goose Creek II, LLC

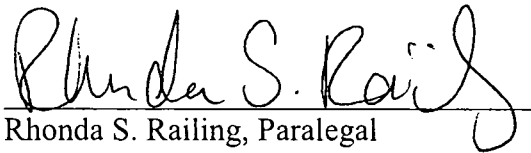
James K. Price
15 Poulnot Lane
Charleston, SC 29401
Defendant

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

James C. Adams, II, Esquire
Brooks Pierce
2000 Renaissance Plaza
230 North Elm Street
Greensboro, NC 27401

May 2, 2014

MOORE TAYLOR LAW FIRM,

A handwritten signature in cursive script that reads "Rhonda S. Railing". The signature is written in black ink and is positioned above a horizontal line.

Rhonda S. Railing, Paralegal
Post Office Box 5709
West Columbia, SC 29171
Telephone: (803) 796-9160



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SC Court of Appeals

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Robert D. Hazel
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Stanley L. Myers
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John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
M. Brooks Biediger
Amber Cary Fulmer
Sarah Taylor Cassidy
Margaret "Meg" Hazel
Billy C. Coleman (Ret.)

May 2, 2014

HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
PO Box 11629
Columbia, South Carolina 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.
Appellate Case No. 2013-002378

Dear Ms. Kitchings:

Please find enclosed the following:

- 1- an original and seven copies of Appellant's Motion for Extension of time;
2- proof of service; and
3- \$25.00 filing fee

We would appreciate your filing the original and six copies, and returning the extra clocked in copy to our office via our courier.

By copy of this letter via U.S. Mail first class, I am notifying all counsel of record of this communication and request and serving them with the same.

1700 Sunset Boulevard, West Columbia SC 29169 | PO Box 5709, West Columbia SC 29171

TEL 803.796.9160 FAX 803.791.8410 www.mooretaylorlaw.com

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
May 2, 2014
Page Two

Thank you for your assistance in this matter. If you require any additional information and/or documentation, please do not hesitate to contact our office.

Best regards,

A handwritten signature in black ink that reads "Meg Hazel". The signature is written in a cursive, flowing style.

Meg Hazel

MAH/rsr
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)
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