

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM Horry COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2011-CP-26-447

**Appellate Case No. 2014-000133**

Daniel Watier and Tammy  
Watier,

Respondents,

v.

Squirrel Systems, Inc.,  
Kenneth J. Jackson, and Peggy  
S. Jackson,

Appellants.

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**RECEIVED**

MAY 16 2014

**SC Court of Appeals**

**APPELLANTS' MOTION FOR EXTENSION OF  
TIME FOR FILING AND SERVICE OF INITIAL BRIEF AND  
DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL**

COMES NOW THE APPELLANTS, by and through their undersigned counsel, who would request of this Honorable Court the opportunity to file their initial brief and designation of matter out of time and serve the Brief on Respondents. This Motion is based upon the following grounds:

On February 25, 2014, counsel for Respondents filed a Notice of Motion and Motion to Dismiss for Failure to File Appeal in a Timely Manner. On March 6, 2014, counsel for Appellants filed a Return to Motion to Dismiss, in which they disputed Respondents' allegations. The Court notified the undersigned by letter dated April 17, 2014, that the initial brief and designation of matter must be served and filed no later than thirty (30) days from the date of the letter. This would make May 17, 2014, as the due date, which is a Saturday, thereby making Monday, May 19, 2014, as the date on which said documents must be served and filed.

Counsel for Appellants respectfully requests an extension of no more than thirty (30) days in which to file and serve said documents. The undersigned was without a litigation paralegal from May 1, 2014, until May 12, 2014, and he had to take on increased office duties during said time.



John C. Thomas  
John C. Thomas, P.A.  
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Conway, South Carolina 29526  
(843) 248-6277  
Attorney for Appellants

Other counsel of record:

Brent B. Greenberg  
Daniel M. Bradley Law Firm, LLC  
Post Office Box 2061  
Mount Pleasant, SC 29465-2061  
Attorney for Respondents

Kenneth R. Moss  
628A Sea Mountain Highway  
North Myrtle Beach, SC 29582

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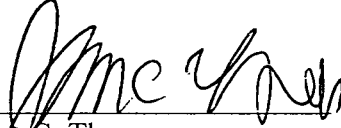
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PROOF OF SERVICE

I certify that I have served Appellants' Motion for Extension of Time for Filing and Service of Initial Brief and Designation of Matter to be Included in the Record on Appeal on Daniel Watier and Tammy Watier by depositing a copy of it in the United States Mail, postage prepaid, on May 14, 2014, addressed to their attorney of record, Brent Greenberg, Post Office Box 2061, Mount Pleasant, South Carolina 29465, and to other counsel of record Kenneth R. Moss, 628A Sea Mountain Highway, North Myrtle Beach, SC 29582.

  
\_\_\_\_\_  
John C. Thomas  
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Attorney for Appellants

**JOHN C. THOMAS, P.A.**  
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May 14, 2014

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

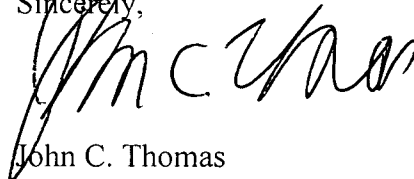
RE: Daniel Watier and Tammy Watier v. Squirrel Systems, Inc., Kenneth J. Jackson, and Peggy S. Jackson, Case No. 2011-CP-26-447  
Appellate Case No. 2014-000133

Dear Ms. Kitchings:

Enclosed for filing is the Appellants' Motion for Extension of Time for Filing and Service of Initial Brief and Designation of Matter to be Included in the Record on Appeal. Also enclosed are the following:

- (1) Proof of service of said motion on the Respondents, and
- (2) A filing fee of \$25.00

Sincerely,



John C. Thomas  
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Attorney for Appellants

cc: Brent Greenberg, Esquire  
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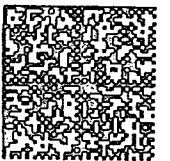
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