

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge  
Trial Court Case No. 2009-CP-22-1045

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APPELLATE CASE NO. 2013-001644

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John Steven Goodwin, Louise C. Goodwin, Thomas L. Puckett and Brenda C. Puckett, Robert Nahama and Jeanne E. Nahama, Thomas Holland and Sharon Louise Holland, Joyce K. Sobel, Robert W. Waruszewski, Richard N. Taylor, Robert K. Spillers (a/k/a Robert Spillers), and Deborah T. Spillers (a/k/a Deborah Spillers, Patrick A. DiAngelo and Deborah A. DiAngelo, Gary E. Owens and Joyce M. Owens, Fount L. Shults and Lynda M. Shults, and Dennis Ridgeway and Teresa Lynn Ridgeway, ....Appellants

v.

Landquest Development, LLC, Kyle V. Corkum, South Bay Properties, LLC, C. R. Thompson and Sons, LLC, Ronald L. Charlton, Bonnie N. Charlton, James R. Charlton and Bayside Property, Inc., the City of Georgetown, Hartford Casualty Insurance Company, Hartford Fire Insurance Company, and National Land Sales, Inc., f/k/a Source One Communities, LLC, a/k/a Source One Signature Communities.....Respondents

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APPELLANTS' MOTION TO  
ENLARGE THE TIME FOR  
FILING RETURN TO  
MOTION TO STRIKE

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AUG 01 2014

**SC Court of Appeals**

K. Douglas Thornton  
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Attorneys for Appellants

July 29, 2014

The Appellants submit the following Motion pursuant to Rule 263, SCACR.

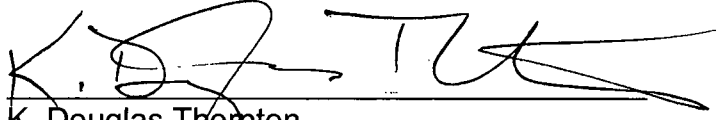
On July 8, 2014, Respondent City of Georgetown filed and served its Motion to Strike a portion of Appellants' Reply Brief, and a Memorandum in support thereof. This Motion and Memorandum were received by Appellants' counsel thereafter, by first class mail. In accordance with Rule 240, SCACR, it appears that Appellants' Return to Respondent's Motion to Strike would have been due at the latest, on or about July 23, 2014. One of Appellants' co-counsel was out of State on a protected vacation when the Motion was initially served; Appellants' other co-counsel, the undersigned, encountered urgent health issues during the time when Appellants' Return was due, and the date for filing Appellants' Return was not calendared by either counsel as a result of the foregoing.

Appellants contend that this appeal and the interest of justice will be served by granting said Appellants an enlargement of time to file a Return to the Motion to Strike. Appellants therefore respectfully pray the Court for an order granting an extension of additional time to file their Return to the Motion.

Due to the circumstances recited above, and the current status of this Appeal, Appellants' respectfully request an extension of time to file a Return to Respondent's Motion to Strike, until Friday, August 1, 2014.

Respectfully submitted:

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ATTORNEYS FOR APPELLANTS

July 29, 2014

Conway, SC

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In the Court of Appeals

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CERTIFICATE OF SERVICE

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I, Regina R. Cagle, as an employee of the Thornton Law Firm, LLC, certify that a copy of Appellants' Motion to enlarge the Time for Filing Return to Motion to Strike, in the above captioned action was served upon all counsel of record on the 30th day of July, 2014, by mailing same to the following addresses:

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AUG 01 2014  
**SC Court of Appeals**

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608 Cypress Street  
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A handwritten signature in cursive script that reads "Regina R. Cagle". The signature is written in black ink and is positioned above a horizontal line.

Regina R. Cagle

July 30, 2014

Conway, SC

# Thornton Law Firm, LLC

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July 30, 2014

Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 116929  
Columbia, South Carolina 29211

Re: John Steven Goodwin, et al. vs. Landquest Development, LLC, et al.  
Appellate case No.: 2013-001644

Dear Ms. Kitchings:

Enclosed herewith please find an original and one (1) copy of Appellants' Motion to Enlarge the Time for Filing Return to Motion to Strike (Respondent, City of Georgetown) and a Certificate of Service in the above captioned matter. Upon filing, please forward a clocked copy to our office in the self-addressed, stamped envelope provided for your convenience.

With kind regards, I am

Yours very truly,

THORNTON LAW, LLC



Regina R. Cagle  
Paralegal to K. Douglas Thornton

Enclosures as stated.

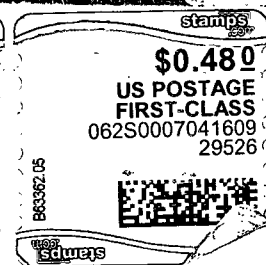
cc: John M. Leiter, Esq.  
Charles T. Smith, Esq.  
Andrew F. Lindermann, Esq.  
Elise Freeman Crosby, Esq.  
Lawrence Michael Hershon, Esq.

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CONWAY, SC 29526



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