

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

M3202

Appellate Case No. 2013-001644

John Steven Goodwin, Louise C. Goodwin, Thomas I. 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

**APPELLANTS' MOTION FOR EXTENSION OF TIME
TO FILE FINAL BRIEF, FINAL REPLY BRIEF and RECORD ON APPEAL**

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Attorneys for Appellants

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AUG 13 2014

August 11, 2014

SC Court of Appeals

Counsel for the Appellants hereby respectfully move this Court, pursuant to Rule 240(a), SCACR, for a ten (10) day extension of time to file their Final Brief, Final Reply Brief and Record on Appeal.

As a result of a computer crash at the Appellant's counsel's office, counsel is unable to retrieve the Initial Brief and Initial Reply Brief to finalize them. The Record on Appeal is completed; however, the Briefs and Record on Appeal should be filed with the Court at the same time. Appellant respectfully contends that good cause exists for an extension of time to file their Final Brief, Final Reply Brief and Record on Appeal.

Wherefore, Appellants contend that this appeal and the interest of justice will be served by granting said Appellant an extension of time, Appellants therefore respectfully pray the Court for an order granting an extension of ten (10) days to file their Final Brief, Final Reply Brief and Record on Appeal.

Accordingly, Appellants request the Court to enter an Order enlarging the time up to and including August 19, 2013, for the Appellants to submit their Final Brief, Final Reply Brief and Record on Appeal.

Respectfully submitted,

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Counsel for Appellants

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
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SC Court of Appeals

Case No. 2009-CP-22-1045

John Steven Goodwin, Louise C. Goodwin, Thomas I. 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

PROOF OF SERVICE

I certify that I have served the **Motion for Extension of Time to File Final Brief, Final Reply Brief and Record on Appeal** by depositing a copy of it in the U.S. Mail, with sufficient postage affixed, on August 11, 2014, addressed to the following attorneys of record:

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August 11, 2014

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August 11, 2014

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

Re: *John Steven Goodwin, et al. v. Landquest Development, LLC, et al.*
Appeal from Georgetown County
Appellate Case No.: 2013-001644

Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of the **Appellants' Motion for Extension of Time to File and Serve Appellants' Final Brief, Final Reply Brief and Record on Appeal**, together with my **Proof of Service** of the same, in the above-referenced matter. Please return a date-stamped copy of each to me in the enclosed self-addressed, stamped envelope.

To cover the cost of filing this Motion, this firm's check in the amount of \$25.00 is also enclosed.

Thank you for your kind assistance in this regard.

Sincerely yours,

LAW OFFICES OF JOHN M. LEITER, PA



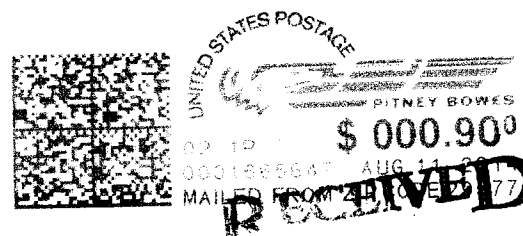
Suzy Pettipas
Paralegal

/smp
Enclosures

cc: K. Douglas Thornton, Esq.
Charles T. Smith, Esq.
Kristen G. Atkins, Esq. & Donald G. Hunt, Jr., Esq.
Elise F. Crosby, Esq.
Andrew F. Lindemann, Esq.
Ronald L. Richter, Esq.
Joseph K. Qualey, Esq. & Lawrence Hershon, Esq.
James Lynn Werner, Esq.

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MYRTLE BEACH, SC 29577



|||||
Honorable Jenny Abbott Kitchings
Clerk of the Court
South Carolina Court of Appeals
Post Office Box 116929
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