

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM EDGEFIELD COUNTY  
Court of Common Pleas

Kathy Ouzts Rushton, Special Referee

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Appellate Case No.: 2014-001742

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**RECEIVED**

OCT 23 2014

**SC Court of Appeals**

73943

Bernard Loyer, Jr., and Sherry Loyer, Respondents,

v.

S17 Owners Association, Inc.; John L. Avent; Frances Avent; Sylvia S. Berger; Robert J. Berning; Jeanne M. Clavel; Greg Connell; Gerald Crawford; Bruce C. Douglas; Jonathan D. Dunn; Les Galazka; Michael V. Goransky; Frank L. Gougher; David E. Harris; Cathryn A. Knight; John M. Lacher; Kyle R. Larson; Laura Linn; Roger McCoig; Charles Wilmot Miller; Michael O'Brien; Carolyn M. Rischbieter; William Satcher; and Belinda Smith-Sullivan, Defendants,

OF WHOM S17 Owners Association, Inc.; John L. Avent, Frances Avent; Sylvia S. Berger; Greg Connell; Jonathan D. Dunn; Michael V. Goransky; Frank L. Gougher; David E. Harris; Cathryn A. Knight; John M. Lacher; Kayle R. Larson; Michael O'Brien; Carolyn M. Rischbieter; and Belinda Smith-Sullivan are Appellants.

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**MOTION FOR EXTENSION OF TIME**

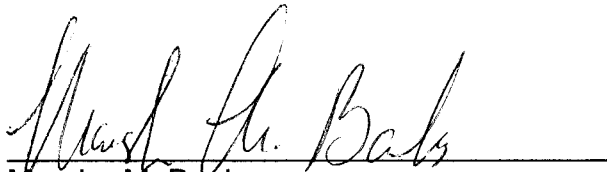
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WHEREAS, the Defendants were notified by the undersigned via U.S. Mail on October 14, 2014, of the pending Appeal in the above-referenced matter and multiple attempts have been made to obtain consent to relief of counsel from said Defendants to which said Defendants have chosen not to respond and that Banks & Associates, P.C. is unavailable to continue with any further representation with regard to this matter;

therefore, this Motion for Extension of Time is being filed to give the said Defendants time to retain appellate counsel, obtain transcripts and respond in a timely fashion.

NOW, THEREFORE, the undersigned hereby moves for a sixty (60) day extension of time within which said Defendants may have to respond to the pending Appeal before this Court.

**WE SO MOVE.**

A handwritten signature in black ink, appearing to read "Marsha M. Banks", is written over a horizontal line.

Marsha M. Banks  
S.C. Bar No. 70737  
BANKS & ASSOCIATES P.C.  
319 Park Avenue SE  
Aiken, SC 29803  
Direct: 706-231-8216  
Office: 803-648-5777  
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OF WHOM S17 Owners Association, Inc.; John L. Avent, Frances Avent; Sylvia S. Berger; Greg Connell; Jonathan D. Dunn; Michael V. Goransky; Frank L. Gougher; David E. Harris; Cathryn A. Knight; John M. Lacher; Kayle R. Larson; Michael O'Brien; Carolyn M. Rischbieter; and Belinda Smith-Sullivan are Appellants.

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**CERTIFICATE OF SERVICE**

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I, Marsha M. Banks, certify that I have caused the within Motion for Extension of Time in the above-referenced matter to be served, via US Mail, on October 21, 2014, to Defendants and Counsel as listed below:

Philip H. Woolhiser, Esq.  
112 Trafalgar Street, SW  
Aiken, SC 29801

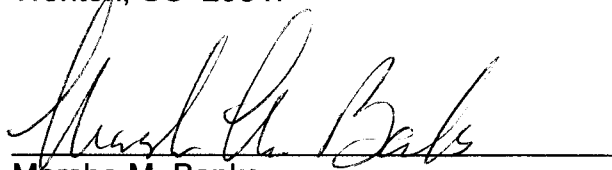
S-17 Owners Association, Inc.  
85 Rachel Avenue  
Trenton, SC 29847

Paul Knapp Simons, Esq.  
111 Park Avenue SW  
Aiken, SC 29801

Robert J. Berning  
120 Pine Needle Road  
Aiken, SC 29803

Bernard Loyer, Jr.  
61 Rachel Avenue  
Trenton, SC 29847

Sherry Loyer  
61 Rachel Avenue  
Trenton, SC 29847

A handwritten signature in cursive script, appearing to read "Marsha M. Banks", written over a horizontal line.

Marsha M. Banks  
Attorney (70737)  
319 Park Avenue SE  
Aiken, SC 29803

# BANKS & ASSOCIATES PC

319 Park Avenue, SE  
Aiken, South Carolina 29801

Telephone: (803) 648-5777

Fax: (803) 648-5228

October 20, 2014

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OCT 23 2014

Ms. Jenny Abbot Kitchings  
Clerk of the South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**SC Court of Appeals**

RE: Bernard and Sherry Loyer v. S17 Owners Association, Inc., et al.  
Case No.: 2014-001742

Dear Ms. Kitchings:

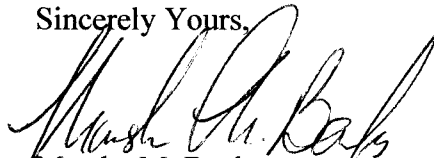
Enclosed please find the original and six copies of the Defendants' Motion for Extension of Time and Certificate of Service.

By copy of this letter, I am serving all opposing counsel and pro se parties.

Thank you for your consideration in this matter.

With regards, I remain

Sincerely Yours,



Marsha M. Banks

Enclosures

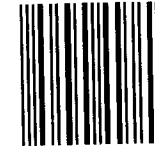
cc: Phillip H. Woolhiser, Esq.  
S-17 Owner's Association, Inc.  
Paul Knapp Simons  
Robert J. Berning  
Bernard Loyer, Jr.  
Sherry Loyer

Marsha M. Banks  
mmblaw@gmail.com

Bradford M. Owensby  
bmowensby@gmail.com



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AIKEN, SC 29801

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**SC Court of Appeals**

Ms. Jenny Abbot Kitchings  
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