

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court of Common Pleas

Haigh Porter, Special Referee

Case No. 2011-CP-33-00016

Wells Fargo Bank, N.A. successor-in-interest
to Wachovia Bank, National Association Plaintiff,

v.

Marion Amphitheatre, LLC, David P. Gannon,
Michael Guarco, Carolina Entertainment Complex, LLC
and 4 Prophets, LLC a/k/a 4 Profits, LLC Defendants,

Of Whom,
David P. Gannon, and Michael Guarco are the Appellants,

And 4 Prophets, LLC a/k/a 4 Profits, LLC is the Respondent.

**APPELLANTS' MOTION FOR EXTENSION OF TIME TO
FILE ITS INITIAL BRIEF AND DESIGNATION OF MATTER**

The Appellants David P. Gannon and Michael Guarco move before the Court pursuant to Rule 240 SCACR for an Order extending the time for filing their Initial Brief and Designation of Matter in the above-referenced matter by thirty (30) days. The motion is based upon Rule 240 SCACR and Appellants' desire to file the most effective brief possible. The Appellants do not anticipate the need to request any additional extensions of briefing time for this matter, although this is the second such request.

WILLCOX, BUYCK & WILLIAMS, P.A.

By: E. Lloyd Willcox
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Attorney for Appellants

July 25, 2012

Other Counsel of Record:
JOHN P. WILLIAMS, JR.
PO BOX 883
MARION SC 29571
Attorney for Respondent 4 Prophets, LLC a/k/a 4 Profits, LLC

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Of Whom,
David P. Gannon, and Michael Guarco are the Appellants,

And 4 Prophets, LLC a/k/a 4 Profits, LLC is the Respondent.

PROOF OF SERVICE

I certify that I have served the **Appellants' Motion for Extension of Time to File Its Initial Brief and Designation of Matter** on the *Respondent*, through their attorney of record, by depositing a copy of same in the United States Mail, postage prepaid, to:

John P. Williams Jr.
PO Box 883
Marion SC 29571

Attorney for Respondent 4 Prophets, LLC a/k/a 4 Profits, LLC

WILLCOX, BUYCK & WILLIAMS, P.A.

By:

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Attorney for Appellants

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Reply To: Florence

HONORABLE JENNY ABBOTT KITCHINGS
CLERK OF COURT
SC COURT OF APPEALS
PO BOX 11629
COLUMBIA SC 29211

RE: Wells Fargo v. Marion Amphitheatre, LLC, Guarco, et al
Case No.: 2011-CP-33-00016
Case Tracking No. 2012-211806
Our File No. 15491.15631

Dear Ms. Kitchings:

Enclosed is an original and seven copies of **Appellant's Motion for an Extension of Time to File Its Initial Brief and Designation of Matter to be Included in the Record on Appeal and Proof of Service** in reference to the above-captioned matter. Also enclosed is our check in the amount of \$25 for the filing fee.

Please file the originals and return a clocked copy to us in the envelope provided for your convenience.

Yours very truly,

E. Lloyd Willcox, II
Email: lloyd@WillcoxLaw.Com

ELW/jaj
Enclosure (Check)

cc: John P. Williams Jr., Esquire
PO Box 883
Marion SC 29571

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