

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
OCT 31 2014
SC Court of Appeals

Townes at Pelham Owners' Association, Inc.,
Respondent,

v.

Donna Boyd, Bank of America, N.A. by Assignment
From Mortgage Electronic Registration Systems,
Defendants,

And

Donna Boyd, Third Party Plaintiff

v.

Eric Hedrick, in his Individual and Official Capacity as
Owner or President of Cornerstone Realty, Inc. and
Cornerstone Realty, Inc., Third Party Defendants,

Of whom Donna Boyd is the Appellant

Appellate Case No. 2014-000701

The Honorable Charles B. Simmons, Jr.
Greenville County
Trial Court Case No. 2102CP2303686


MOTION FOR CONTINUANCE

NOW COMES, the Respondent, Townes at Pelham Owners' Association, Inc., by and through its undersigned counsel, and moves for a thirty (30) day continuance to file its initial brief and designation of matter in the above-referenced matter. This motion is based upon the following facts:

- 1) The Appellant was given approximately ninety (90) days to cure all the deficiencies requested by the Court.

181

- 2) The undersigned as Respondent's counsel received notice of the Court's decision by mail on October 14, 2014.
- 3) The Respondent has elected to associate other counsel to assist with the filing of its initial brief and subsequent pleadings.
- 4) The Respondent's counsel has requested more than three weeks to prepare its initial brief and designation of matter.



J. Chris Brown, SC Bar No. 07114
Babb & Brown, P.C.
505 West Butler Road
Greenville, SC 29607
(864) 422-0022
Attorney for Respondent, Townes at Pelham, Inc.

Greenville, South Carolina
October 28, 2014

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
OCT 31 2014
SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Charles B. Simmons, Jr., Circuit Court Judge

Case No. 2014-000701

Townes at Pelham Owners'
Association, Inc.

Respondent,

v.

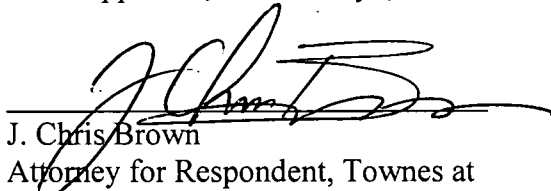
Donna Boyd

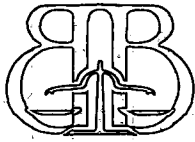
Appellant

PROOF OF SERVICE

I certify that I have served the Motion for Continuance requesting additional time to file the initial for the above-referenced action by depositing a copy of it in the United States Mail, postage prepaid, on Tuesday, October 28, 2014, addressed to the Appellant, Donna Boyd, at Post Office Box 1168, Mauldin, South Carolina, 29662

October 28, 2014


J. Chris Brown
Attorney for Respondent, Townes at
Pelham Owners' Association, Inc.
505 W. Butler Road
Greenville, SC 29607



BABB & BROWN, P.C.
ATTORNEYS AT LAW

ATTORNEYS
EVERETTE H. BABB
J. CHRIS BROWN*
H. STEWART JAMES
*ALSO LICENCED IN GEORGIA

October 28, 2014

VIA FACSIMILE AND US MAIL
Fax No. (803) 734-1839

Ms. Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RE: Townes at Pelham v. Donna Boyd
Appellate Case No. 2014-000701

RECEIVED

OCT 31 2014

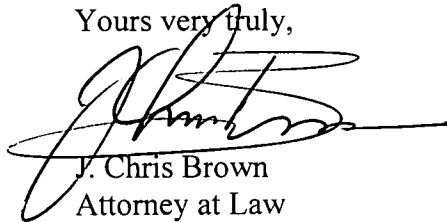
SC Court of Appeals

Dear Ms. Kitchings:

I have enclosed an original and one copy of a Motion for Continuance and Proof of Service for the above-referenced matter. Please file the original documents and clock and return the copy to me in the stamped, self-addressed envelope provided. If you have any questions, please contact me at your earliest convenience.

Since the original thirty (30) day period to file the Respondent's initial brief and designation of matter will expire on November 8, 2014, your immediate attention to this matter will be greatly appreciated.

Yours very truly,



J. Chris Brown
Attorney at Law

JCB:ah

Enclosures



BABB & BROWN, P.C.

ATTORNEYS AT LAW

505 W. BUTLER RD., GREENVILLE, SC 29607

RECEIVED

OCT 31 2014

SC Court of Appeals



Ms Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia SC 29211-1629



\$0.480
US POSTAGE
FIRST-CLASS
FROM 29607
OCT 28 2014

stamps.com



062S0007302653