

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

74092

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas
Benjamin H. Culbertson, Circuit Court Judge

RECEIVED

NOV 07 2014

SC Court of Appeals

Case No.: 2012-CP-22-00889
(Appellate Case No.: 2014-001104)

Alexander Mangialardo and Audra Mangialardo.....Appellants

v.

Blue Ridge Ventures, LLC, Gerald W. Kelly, Elizabeth L. Kelly,
South Carolina Bank & Trust, NA, Century 21 – The Beach Company, LLC,
Caison Engineering Company, Inc., Keith Duncan,
Attorneys Title Insurance Fund, Inc., G. Turner Perrow, Jr. and
Tidelands Law, LLCDefendants

Of Whom Blue Ridge Ventures, LLC, Gerald W. Kelly, Elizabeth L. Kelly,
Caison Engineering Company, Inc., Keith Duncan,
Attorneys Title Insurance Fund, Inc., G. Turner Perrow, Jr. and Tidelands Law, LLC
are the Respondents.

MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF AND DESIGNATION OF MATTER
OF RESPONDENTS GERALD W. KELLY AND ELIZABETH L. KELLY

Respondents Gerald W. Kelly and Elizabeth L. Kelly (the “Kellys”) move pursuant to Rule 263(b), SCACR before this Honorable Court for a thirty (30) day extension to file Respondents’ Initial Brief and Designation of Matter.

The grounds for this motion are:

1. The undersigned attorney has had a busy trial and deposition schedule in

Jack M. Scoville, Jr.
Attorney at Law
A Professional Association
1001 Front Street
Post Office Drawer 1228
Georgetown, South Carolina 29442

TELEPHONE: (843) 546-1130
FAX # (843) 546-0726

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November 6, 2014

NOV 07 2014

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211-1629

RE: Alexander Mangialardo and Audra Mangialardo vs. Blue Ridge Ventures, LLC, et al.
Case No.: 2012-CP-22-00889
SC Court of Appeals Case No.: 2014-001104

Dear Ms. Kitchings:

I represent Gerald W. Kelly and Elizabeth L. Kelly, Respondents in the above matter. I am writing to request a thirty (30) day extension of time to file and serve the Initial Brief and Designation of Matter.

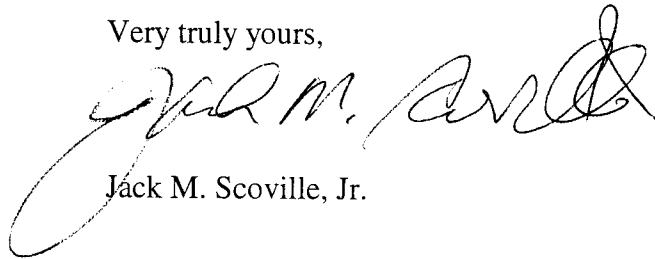
Please find enclosed the original and six copies of the Motion for Extension of Time to File the Initial Brief and Designation of Matter of Respondents Gerald W. Kelly and Elizabeth L. Kelly, along with Proof of Service, in the above-referenced matter. Also enclosed is payment in the amount of \$25 to defray the filing fee. I would appreciate your filing the original documents in your office and returning to me clocked copies. A self-addressed stamped envelope is enclosed for your use.

Thank you in advance for your assistance in this request.

November 6, 2014
Clerk, South Carolina Court of Appeals
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With kindest regards, I remain

Very truly yours,

A handwritten signature in black ink, appearing to read "Jack M. Scoville, Jr.", with a large, stylized flourish at the end.

Jack M. Scoville, Jr.

JMSjr/mmw

Enclosures

cc: Michael Chambers, Esq.
G. Turner Perrow, Esq.
Karen Sauls, Esq.
Jeffrey E. Johnson, Esq.
Caison Engineering Company, Inc., c/o Albert A. Caison
Blue Ridge Ventures, LLC, c/o Keith Duncan
Keith Duncan
Gerald and Elizabeth Kelly

JACK M. SCOVILLE, JR.

ATTORNEY AT LAW

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GEORGETOWN, SOUTH CAROLINA 29442

To:

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211-1629