

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas
James C. Williams, Circuit Court Judge

74235

Appellate Case No. 2014-1915

The Bristol Condominium Property Owners' Association..... Respondent,

v.

John T. Lucas, Sr. as Trustee of the John T. Lucas Revocable Trust Dated
November 10, 2004, and Carolyn C. Lucas as Trustee of the Carolyn C. Lucas
Revocable Trust Dated November 10, 2004, Defendants/Counterclaim Plaintiffs,

Of Whom John T. Lucas, Sr. is the.....Appellant,

v.

The Bristol Condominium Property Owners' Association, Counterclaim
Defendant.

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RESPONDENT'S MOTION FOR EXTENSION OF TIME

SC Court of Appeals

Pursuant to South Carolina Appellate Court Rule 263(b), Respondent, The
Bristol Condominium Property Owners' Association, moves for an extension of
thirty (30) days from the existing deadline to file its initial brief in this matter.

This is Respondent's first request for an extension and the additional time
is needed in order to obtain necessary records from the Special Referee who
issued the subject Orders on Appeal. Respondent's Initial Brief will be due on or
before December 28, 2014, if the extension is granted. Respondent's counsel has

conferred with Appellant's counsel regarding this motion and he consents to the thirty (30) day extension.

For the reasons set forth herein, Respondent requests a thirty (30) day extension to serve and file its Initial Brief.



David B. Wheeler (SC Bar No. 6055)
Joseph T. Belton (SC Bar No. 71993)
MOORE & VAN ALLEN, PLLC
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Charleston, SC 29413-2828
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ATTORNEYS FOR RESPONDENT

November 20, 2014

THE STATE OF SOUTH CAROLINA
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Of Whom John T. Lucas, Sr. is the.....Appellant,

v.

The Bristol Condominium Property Owners' Association, Counterclaim
Defendant.

PROOF OF SERVICE

This is to certify that I have this day served counsel for the Appellant in the
foregoing matter with a copy of the foregoing **RESPONDENT'S MOTION FOR
EXTENSION OF TIME** by depositing same in the United States Mail with
adequate postage affixed thereon to ensure delivery, addressed as follows:

Joe Mooneyham, Esquire
Cody H. Rankin, Esquire
Mooneyham Berry, LLC
Post Office Box 8359
Greenville, South Carolina 29604
Telephone: (864) 421-0036

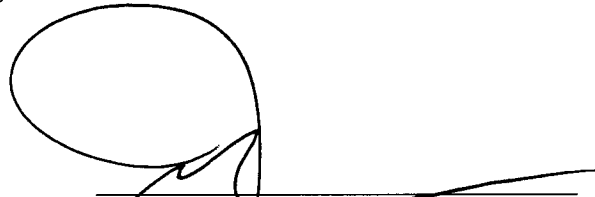
Email: Joe@mbllc.com

ATTORNEYS FOR APPELLANT

and

M. Dawes Cooke, Jr.
K. Michael Barfield
Barnwell Whaley Patterson & Helms, LLC
288 Meeting Street, Suite 200
Post Office Drawer H
Charleston, South Carolina 29402
Telephone: (843) 577-7700

Counsel for Respondent in
Appellate Case No.: 2014-118

A large, stylized handwritten signature in black ink, appearing to be 'David B. Wheeler', is written over the printed name and extends across the top of the respondent's address block.

David B. Wheeler (SC Bar No. 6055)
Joseph T. Belton (SC Bar No. 71993)
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ATTORNEYS FOR RESPONDENT

Moore & Van Allen

VIA OVERNIGHT MAIL

November 20, 2014

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

Joseph T. Belton
Attorney at Law

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***Re: The Bristol Condominium Property Owners' Association, Respondent, v. John T. Lucas, Sr. as Trustee of the John T. Lucas Revocable Trust Dated November 10, 2004, and Carolyn C. Lucas as Trustee of the Carolyn C. Lucas Revocable Trust Dated November 10, 2004, Defendants/Counterclaim Plaintiffs, Of Whom John T. Lucas, Sr. is the Appellant, v. The Bristol Condominium Property Owners' Association, Counterclaim Defendant.
Appellate Case No. 2014-1915
MVA File No. 034956-136***

Dear Ms. Kitchings:

Please find enclosed for filing an original and six (6) copies of Respondent's Motion for Extension of Time and the Proof of Service in the above referenced case. I have also enclosed a check in the amount of \$25.00 for the requisite filing fee.

Please file the originals and return a date-stamped copy to me in the enclosed self-addressed, stamped envelope.

Thank you for your assistance in this matter. If there are any questions as to any of the above, please call me.

Sincerely,

MOORE & VAN ALLEN PLLC

Joseph T. Belton

JTB/jmc
Enclosures – as stated

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SC Court of Appeals

Page 2

cc (w/ encl.): Joe Mooneyham, Esq.
Cody H. Rankin, Esq.
M. Dawes Cooke, Jr., Esq.
K. Michael Barfield, Esq.

JAY UNTHANK
(843) 579-7097
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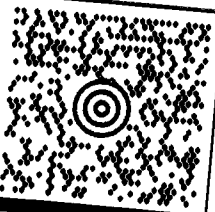
SHIP TO:
HON. JENNY ABBOTT KITCHINGS
SOUTH CAROLINA COURT OF APPEALS
CLERK OF COURT
1015 SUMTER STREET
COLUMBIA SC 29201

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201



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