

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2013-CP-23-05891

RECEIVED

JAN 20 2015

SC Court of Appeals

M4807

NAI Earle Furman, LLC,Respondent,


v.

Pleasant Grove Properties, Inc.,Appellant.

RESPONDENT’S MOTION FOR EXTENSION OF TIME

The Respondent, by and through the undersigned counsel and pursuant to rule 240 of the South Carolina Appellate Court Rules, respectfully moves this Court for an Order granting a thirty (30) day extension of time to file the Initial Brief and Designation of Matter on Appeal in the above captioned action. Due to the undersigned being in a General Sessions trial January 5, 2015 through January 12, 2015 and the undersigned’s current workload, the undersigned needs additional time to prepare the brief and respectfully requests the Respondent be granted until February 18, 2015 to file its Initial Brief and Designation of Matter on Appeal. The Respondent’s counsel has attempted to reach Appellant’s counsel regarding this request but has not yet received a response.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "P. Landis", written over a horizontal line.

Paul S. Landis
FAYSSOUX LAW FIRM, P.A.
209 E. Washington Street
Greenville, South Carolina 29601
(864) 233-0445
(864) 233-4781 (Fax)

Attorney for Respondent

January 15, 2015

THE STATE OF SOUTH CAROLINA
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NAI Earle Furman, LLC,Respondent,

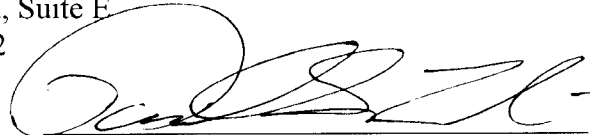
v.

Pleasant Grove Properties, Inc.,Appellant.

PROOF OF SERVICE

I certify that I have, this 15th day of January, 2015, served the Respondents' Motion for Extension of Time by depositing a copy of the same in the United States Mail, postage prepaid, and addressed as follows:

Jonathan P. Whitehead, Esq.
Attorney at Law
410 E. Butler Road, Suite F
Mauldin, SC 29662



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Attorneys for Respondents

January 15, 2015

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JAMES W. FAYSSOUX, SR.
JAMES W. FAYSSOUX, JR.

FAYSSOUX
L A W I R M P. A.

PAUL S. LANDIS
T. HUNT REID

January 15, 2015

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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

Re: NAI Earle Furman, LLC v. Pleasant Grove Properties, Inc.
 C.A. No.: 2013-CP-23-05891

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the Motion for Extension of Time, our check in the amount of \$25.00 and an original and two copies of the Proof of Service. I have provided a self-addressed envelope for return of a filed copy of the Motion for Extension of Time and Proof of Service.

Please do not hesitate to contact me should you have any questions.

With kindest regards, I am

Sincerely yours,


Paul S. Landis

PSL/pw

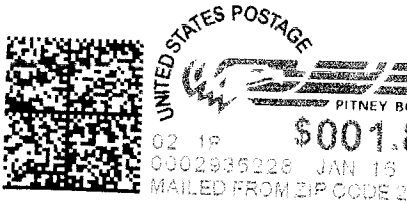
Enclosures (as stated)

cc: Jonathan P. Whitehead, Esq.

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SC Court of Appeals



FAYSSOUX
LAW FIRM P.A.

POST OFFICE BOX 10207
GREENVILLE, SC 29603

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

