

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**

MAR 26 2015

**SC Court of Appeals**

76493

NAI Earle Furman, LLC, .....Respondent,

v.

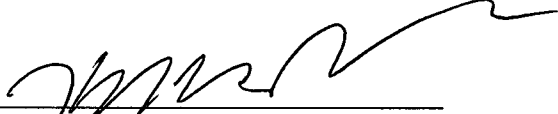
Pleasant Grove Properties, Inc., .....Appellant.

**APPELLANT’S MOTION FOR LATE FILING AND SERVICE OF  
RECORD ON APPEAL**

The Appellant, by and through its undersigned counsel and pursuant to Rule 240 of the South Carolina Appellate Court Rules, respectfully moves this Court for an Order allowing Appellant an extension of time to prepare and serve the Record on Appeal on the Respondent and to file proof of such service late. Due to the undersigned being a sole practitioner and having to miss several days of work during the last thirty (30) days due to both inclement weather and family sicknesses, several court appearances out of town, and the undersigned’s current workload, the undersigned needs additional time to prepare and serve the Record on Appeal in this case and to file a late Proof of Service of the Record on Appeal and respectfully requests the Appellant be granted until April 18, 2015, to prepare and serve the Record on Appeal and to file Proof of Service thereof. The undersigned discussed this

Motion and request with Respondent's counsel on March 24, 2015, and the undersigned understands that Respondent's counsel has no objections to this request.

Respectfully submitted,



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Jonathan P. Whitehead (SC Bar#75324)  
The Law Offices of Jonathan P. Whitehead, LLC  
410 E. Butler Rd., Suite E.  
Mauldin, South Carolina 29662  
(864) 561-8011  
Attorney for Appellant

March 24, 2015

THE STATE OF SOUTH CAROLINA  
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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2013-CP-23-05891

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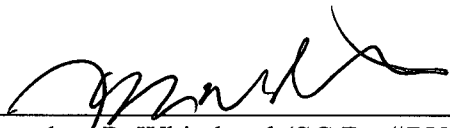
v.

Pleasant Grove Properties, Inc.,... . Appellant.

PROOF OF SERVICE

I certify that I have, this 24<sup>th</sup> day of March, 2015, served the Appellant's Motion for Late Filing of the service of the record on appeal in the within appeal by depositing a copy of the same in the United States Mail, postage prepaid, and addressed as follows:

Paul S. Landis, Esq.  
Fayssoux Law Firm, P.A.  
209 E Washington Street  
Greenville, South Carolina 29601

  
Jonathan P. Whitehead (SC Bar#75324)  
The Law Offices of Jonathan P. Whitehead, LLC  
410 E. Butler Rd., Suite E.  
Mauldin, South Carolina 29662  
(864) 561-8011

Attorney for Appellant

March 24<sup>th</sup>, 2015

THE LAW OFFICES OF  
**JONATHAN P. WHITEHEAD, LLC**

410 E. Butler Road, Suite E.  
Mauldin, South Carolina 29662

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JONATHAN P. WHITEHEAD

TELEPHONE (864) 561-8011  
FACSIMILE (864) 675-0205

March 24, 2015

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

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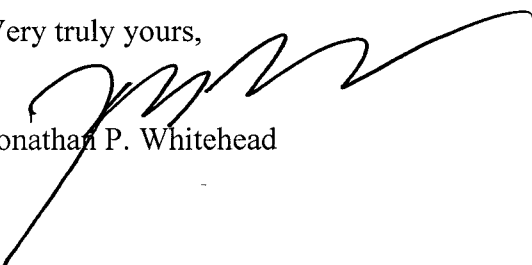
**RE: NAI Earle Furman, LLC vs. Pleasant Grove Properties, Inc.**  
**Appellate Case No. 2014-002292**

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of Appellant's Motion for Late Filing and Service of Record on Appeal, Check #1882 in the amount of \$25.00 and the original and two (2) copies of the Proof of Service. I have also enclosed a self-addressed envelope for return of a filed copy of the Motion and Proof of Service

Please do not hesitate to contact me should you have any questions. Thanks for consideration of these matters. With kindest regards, I remain,

Very truly yours,

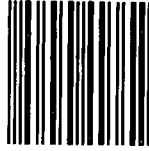
  
Jonathan P. Whitehead

Enclosures

cc: Paul S. Landis, Esq.  
P.O. Box 10207  
Greenville, SC 29603



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SC Court of Appeals

BY ABBOTT KITCHINGS

P.O. BOX 11629

COURT OF APPEALS

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