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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

RECEIVED

Eugene C. Griffith, Jr., Circuit Judge

JUL 07 2015

SC Court of Appeals

Appellate Case No. 2014-002587
Common Pleas Case No. 2012-CP-40-6974

S. Coley Brown,.....Appellant,

v.

Spring Valley Homeowners Association, Inc.....Respondent.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
APPELLANT'S INITIAL REPLY BRIEF AND ANY
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Andrew S. Radeker
Harrison & Radeker, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant

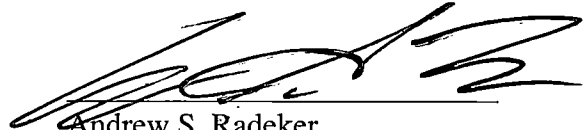
Appellant hereby moves pursuant to Rule 263(b), SCACR, for a 10-day extension of the time in which to serve and file Appellant's Initial Reply Brief and any accompanying designation of matter to be included in the record on appeal in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The Respondent served its initial brief on June 29, 2015; however, because the undersigned's office was closed on Friday, July 3 for the July 4 holiday and likely due to the decreasing speed of average United States mail delivery, the undersigned did not actually receive that brief until yesterday, July 6, 2015.
2. Based on the date of service of Respondent's brief, the deadline for service and filing of Appellant's Initial Reply Brief and any accompanying designation of matter to be included in the record on appeal is currently July 9, 2015 – only three days after the undersigned received the Respondent's brief.
3. The Respondent's brief is 50 pages long. There is not anything wrong with that, but it does mean that it will take some time for the undersigned to read and digest the brief, read and digest authorities cited in the brief, and then draft a reply brief.
4. The undersigned believes that process will take longer to complete than will allow it to be finished by July 9.
5. Respondent's counsel has consented to this extension, as shown by the attached email message.

6. Appellant's counsel believes there is good cause to grant the requested 10-day extension to July 20, 2015 (since July 19 is a Sunday).

WHEREFORE Appellant prays for an Order extending the time in which to serve and file Appellant's Initial Reply Brief and any accompanying designation of matter to be included in the record on appeal to July 20, 2015.

Respectfully submitted,



Andrew S. Radeker
Harrison & Radeker, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant

July 7, 2015

Drew Radeker

From: Ely Grote <eog@brownandbrehmer.com>
Sent: Monday, July 06, 2015 4:58 PM
To: Drew Radeker
Subject: RE: Brown v. Spring Valley HOA

That is fine with me.

Ely O. Grote
Attorney at Law
Brown & Brehmer
P.O. Box 7966
Columbia, SC 29202
Phone: (803) 771-6600
Fax: (803) 252-1620

From: Drew Radeker [<mailto:Drew@harrisonfirm.com>]
Sent: Monday, July 06, 2015 11:40 AM
To: Ely Grote
Subject: RE: Brown v. Spring Valley HOA

Ely:

I write to ask if you will consent to an extension until July 20 of my time to serve and file a reply brief and designation in this case. Due to an intervening holiday weekend and the vicissitudes of the ever-slowng United States mail, I did not get your respondent's brief until today, which would leave me with only three days to digest your apparently quite thorough brief and then write a reply brief to that.

Thanks. Let me know.

Drew Radeker

HARRISON & RADEKER, P.A.

ATTORNEYS AT LAW

*Real Estate / Property Disputes · Foreclosure · Media Law · Zoning · Criminal Defense · Appeals
Personal Injury · Consumer Law · Mediation/Arbitration · False Arrest · Commercial Litigation*

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From: Ely Grote [<mailto:eog@brownandbrehmer.com>]
Sent: Tuesday, June 02, 2015 10:22 AM
To: Drew Radeker
Subject: RE: Brown v. Spring Valley HOA

Thanks. Appreciate it.

Ely O. Grote
Attorney at Law
Brown & Brehmer
P.O. Box 7966
Columbia, SC 29202
Phone: (803) 771-6600
Fax: (803) 252-1620

From: Drew Radeker [<mailto:Drew@harrisonfirm.com>]
Sent: Tuesday, June 02, 2015 10:20 AM
To: Ely Grote
Subject: RE: Brown v. Spring Valley HOA

Of course, sir. I consent.

Drew Radeker

HARRISON & RADEKER, P.A.

ATTORNEYS AT LAW

*Real Estate / Property Disputes · Foreclosure · Media Law · Zoning · Criminal Defense · Appeals
Personal Injury · Consumer Law · Mediation/Arbitration · False Arrest · Commercial Litigation*

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From: Ely Grote [<mailto:eog@brownandbrehmer.com>]
Sent: Tuesday, June 02, 2015 10:19 AM
To: Drew Radeker
Subject: Brown v. Spring Valley HOA

Drew:

Would you consent to a 2nd extension for the filing of Respondent's initial brief?

Ely O. Grote
Attorney at Law
Brown & Brehmer
P.O. Box 7966
Columbia, SC 29202
Phone: (803) 771-6600
Fax: (803) 252-1620

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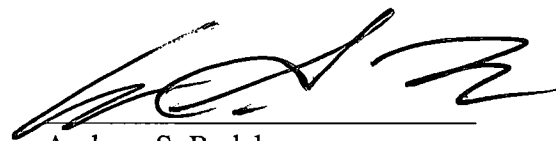
PROOF OF SERVICE

I certify that I served the foregoing motion for extension by depositing a copy of it on the date shown below in the United States Mail, postage prepaid, addressed as follows:

Ely O. Grote, Esq.
Brown & Brehmer
P.O. Box 7966
Columbia, SC 29202

Charles A. Krawczyk, Esq.
Finkel Law Firm LLC
P.O. Box 1799
Columbia, SC 29202

July 7, 2015



Andrew S. Radeker
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Attorney for Appellant

LAW OFFICES
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923 CALHOUN STREET
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James C. Harrison, Jr.*
Andrew S. Radeker
Taylor M. Smith IV

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Columbia, SC 29250

(803) 779-2211
(803) 779-6700 (FAX)

* Mediator/Arbitrator

July 7, 2015

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JUL 07 2015

SC Court of Appeals

VIA HAND DELIVERY

The Hon. Jenny Abbott Kitchings
Clerk of Court, Court of Appeals of South Carolina
1220 Senate Street
Columbia, South Carolina 29201

Re: S. Coley Brown v. Spring Valley Homeowners Association, Inc.
Appellate Case No. 2014-002587


Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced case are an original and seven copies of a motion for extension of time, with attached proof of service thereof. Also enclosed is this firm's check in the amount of \$25.00 as the motion fee.

Kindly file these documents and return a file-stamped copy to the bearer of this letter. Of course, if you or your staff have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am,

Very truly yours,
HARRISON & RADEKER, P.A.



Andrew S. Radeker

ASR/

Enclosures

cc: Ely O. Grote, Esq.
Charles A. Krawczyk, Esq.