

METCALFE & ATKINSON, LLC  
ATTORNEYS AT LAW

August 19, 2015

The Honorable Daniel E. Shearouse, Clerk  
South Carolina Supreme Court  
Supreme Court Building  
1231 Gervais Street  
Columbia, SC 29201

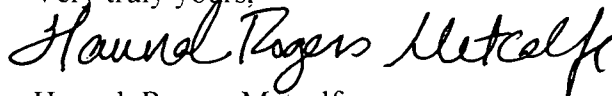
Re: R.C. Frederick Hanold, III and Rose F. Hanold, and Carol R. Mitchell and George P. Mitchell, Jr. v. Pelham Farm, LLC et al.  
Appellate Case No.: 2015-001555

Dear Mr. Shearouse:

On behalf of Respondents, I write to respectfully request a five-day extension of time to file and serve a Return to the Writ of Certiorari in the above-referenced action. A five-day extension of the original August 19, 2015 deadline would establish the new deadline for service and filing as August 24, 2015. Our check for the \$25.00 filing fee is enclosed. It would be greatly appreciated if you would return a clocked copy of this letter to me in the enclosed self-addressed stamped envelope.. Thank you for your attention to this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,



Hannah Rogers Metcalfe

HRM/awr  
Enclosures

cc: John Nichols, Esquire  
William Herlong, Esquire  
Randall S. Hiller, Esquire

**RECEIVED**

AUG 24 2015

**SC SUPREME COURT**

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Edward W. Miller, Circuit Court Judge

Appellate No. 2015-001555

R.C. Frederick Hanold, III and Rose F. Hanold, and Carol R. Mitchell and George P. Mitchell, Jr., ..... Respondents.

v.

Watson's Orchard Property Owners Association, Inc., a South Carolina Corporation, and Pelham Farm, LLC, a South Carolina Corporation, Legacy One, LLC, a South Carolina Corporation, SESP LLC, a South Carolina Corporation, an unknown Trustee of the Revocable Trust Agreement Dated March 19, 1996 established by James B. Stephens as amended, and unknown Jay Stephens and Mike Stephens as Co-Personal Representative of the Estate of James B. Stephens, ..... Defendants.

Of whom Pelham Farm, LLC, a South Carolina Corporation, Legacy One, LLC, a South Carolina Corporation, an unknown Trustee of the Revocable Trust Agreement Dated March 19, 1996 established by James B. Stephens as amended, and unknown Jay Stephens and Mike Stephens as co-Personal Representative of the Estate of James B. Stephens, are the ..... Petitioners.

v.

Property Owners in Watson's Orchard Subdivision: N. Carter Poe, III; McNally Reeves, as Trustee of the Residual Trust under item Five of the Last Will and Testament of Hattie L. Reeves dated February 9, 1998; Janet B. Yusi; Lucy S. Tiller; James G. Stephens; Rachel P. McKaughan; Ramon J. Ashy and Jana Ashy; Christopher D. Scalzo and Heather V. Scalzo; Erma R. Rash, as Trustee of the Erma R. Rash Revocable Trust dated February 12, 2010; James Edwin Conrad, as Trustee of the James Edwin Conrad Living Trust dated September 7, 2010; Sue Lane Conrad; Horst H. H. Eschenberg and Floride C. Eschenberg; Caryl L. Clover, as Trustee of the Caryl L. Clover Revocable Living Trust Agreement dated May 12, 1999; Mary F. Newell; Timothy M. Conroy and Elizabeth W. Conroy; Nathan Scolari; Joel Wells Norwood and Lynn Norwood; J. Lynn Shook; Juan Hernandez and Janice M. Pelletier; Scott P. Payne and Kathleen H. Payne; Joe G. Thomason and Dana L. Henry Thomason; Traci Segura; Cameron E. Smith and Joan B. Smith; Charles E. Howard and Sharon F. Howard; Penelope J. Galbraith; Meredith C. Vry; Delores B. Mitchell; Lisette M. Silva and Mary F. Colley; Ilona K. Alford and William G. Alford; George T. McLeod and Martha T. McLeod; Ronald S. Wilson and Robin E. Wilson; The Merrill J. Gildersleeve and Anore L. Novak Revocable Living Trust dated November 1, 1996; Anna Marie T. Azores and Kim O. Gococo; Ashley Westrope as Trustee of Martha Randolph Westrop Trust dated June 6, 1988; Cliff C. Jollie and Martha W. Jollie; David A. Saliny and Xiaoli Saliny; Lecia S. Franklin; Dean D.

Varner and Deborah P. Varner; W. Frank Durham, Jr.; Christine M. Howard; Samuel P. Howard, Jr. and Jane H. Howard; Manfred E. Kramer and Jane J. Kramer; Mary J. Steele; James J. Barrett, III and Kimberly A. Barrett; Richard A. Herman and Patricia L. Herman,.....Third Party Defendants.

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PROOF OF SERVICE


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The undersigned hereby certifies that on the date indicated below, she served counsel for the Petitioners with a copy of the *Request for Extension of Time to File Respondent's Return to Writ of Certiorari* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

John S. Nichols, Esq.  
Bluestein Nichols  
PO Box 7965  
Columbia, SC 29202

William D. Herlong, Esq.  
The Herlong Law Firm, LLC  
PO Box 2003  
Greenville, SC 29602-2003

Randall S. Hiller, Esq.  
850-B Wade Hampton Blvd.  
Greenville, SC 29609

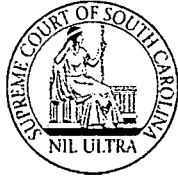
  
Hannah Rogers Metcalfe  
METCALFE & ATKINSON, LLC

August 19, 2015  
Greenville, South Carolina

**RECEIVED**

AUG 24 2015

**SC SUPREME COURT**



# The Supreme Court of South Carolina

Metcalf & Atkinson

08/19/2015

## RECEIPT #77028

**Case No:** 2015-001555  
**Case Short Title:** R.C. Frederick Hanold, III v. Watson's Orchard Property Owner's Association  
**Event:**  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 2323  
**Check/Money Order Date:** 08/24/2015  
**Comments:**