

76993

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Appellate Case No. 2015-000589

**RECEIVED**

AUG 21 2015

SC Court of Appeals

Jack R. Harrell, Jr. and Tina W. Harrell ..... Appellants,

v.

Keowee Falls Investment Group, LLC, The Cliffs Communities,  
LLC and S&ME, Inc.

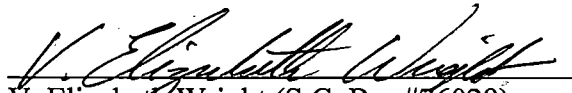
*Of whom* Keowee Falls Investment Group is the.....Respondent.

**MOTION FOR EXTENSION OF TIME**

Pursuant to Rules 208, 209 and 240, SCACR, Appellants Jack R. and Tina W. Harrell respectfully move for an extension of time to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal. Appellants' counsel requests a 30-day extension of time, which would extend the deadline to September 13, 2015. Counsel makes this request due to a heavily-packed schedule and family concerns. Appellant's counsel has graciously agreed to this extension.

Respectfully submitted.

V. ELIZABETH WRIGHT LAW FIRM, LLC



V. Elizabeth Wright (S.C. Bar #76029)

E-Mail: bethwrightattorney@gmail.com

217 E. Park Avenue  
Greenville, SC 29601  
864.326.5281

Other Counsel of Record:

Elizabeth M. McMillan  
McAngus, Goudelock & Courie, LLC  
P.O. Box 2980  
Greenville, South Carolina 29602  
(864) 239-4037  
[beth.mcmillan@mgclaw.com](mailto:beth.mcmillan@mgclaw.com)

Greenville, South Carolina  
August 19, 2015

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

AUG 21 2015

Clifton Newman, Circuit Court Judge **SC Court of Appeals**

Appellant Case No. 2015-000589

Jack R. Harrell, Jr. and Tina W. Harrell ..... Appellants,

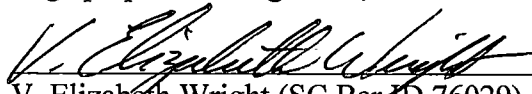
v.

Keowee Falls Investment Group, LLC, The Cliffs  
Communities, LLC and S&ME, Inc.

*Of whom* Keowee Falls Investment Group is the.....Respondent.

**PROOF OF SERVICE**

I certify that I have served the **APPELLANTS' MOTION FOR EXTENSION OF TIME** on counsel for the Respondent and for The Cliffs Communities, LLC Elizabeth M. McMillan, at her address of P.O. Box 2980, Greenville, SC 29602, by depositing it into the U.S. Mail, first class postage prepaid on August 19, 2015.



V. Elizabeth Wright (SC Bar ID 76029)  
V. ELIZABETH WRIGHT LAW FIRM,  
LLC

217 E. Park Avenue  
Greenville, SC 29601  
(864) 326-5281

*Attorney for the Appellants*

Greenville, South Carolina  
August 19, 2015

V. Elizabeth Wright, PA  
217 E. Park Avenue  
Greenville, SC 29601  
(864) 326-5281  
bethwrightattorney@gmail.com

August 18, 2015

**RECEIVED**  
AUG 21 2015  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RE: Jack R. Harrell, Jr. and Tina W. Harrell, Appellants v. Keowee Falls Investment Group, LLC, The Cliffs Communities, LLC and S&ME, Inc. *of whom* Keowee Falls Investment Group is the Respondent.  
Appellate Case No. 2015-000589

Dear Ms. Kitchings:

Please find enclosed for filing the following:

1. Appellants' Motion for an Extension of Time;
2. Proof of Service;
3. Seven (7) copies of the motion and proof of service;
4. A check written in the amount of \$25.00 for the filing fee; and
5. A self-addressed, stamped envelope.

Please return the clocked-in copy to me by way of the self-addressed, stamped envelope. By copy of this correspondence I have served counsel for the Respondent.

Very truly yours,

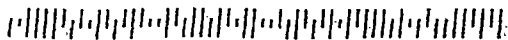
V. ELIZABETH WRIGHT LAW FIRM, LLC



V. Elizabeth Wright

VEW  
Enclosure(s)

cc: Elizabeth M. McMillan, Esq.



V. Elizabeth Wright, P.A.  
217 E. Park Avenue  
Greenville, SC 29601

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
AUG 21 2015  
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