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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**  
SEP 23 2015  
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Judge

Common Pleas Case No. 2010-CP-10-6239  
Appellate Case No. 2015-000940

D.A. Morgan Price,.....Respondent,

v.

Todd Chas, Jacara Chas, Marsh Winds Owners Association, Inc. a/k/a Marsh Winds  
Horizontal Property Regime, and The Marshland Communities, LLC, Defendants,

Of whom Todd Chas and Jacara Chas are the.....Appellants.

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

The Respondent hereby moves pursuant to Rule 263(b), SCACR, for a 30-day extension of the time in which to serve and file the Respondent's initial brief and designation of matter to be included in the record on appeal. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The deadline for service and filing of the reply brief is currently today, September 23, 2015.

2. Respondent's counsel was recently involved in a lengthy trial that took time away from several other work commitments, including drafting the brief in this case.
3. Unfortunately, it is not realistic that Respondent's counsel will finish the brief in this case today.
4. This is the first extension that the Respondent has sought in this case.
5. Appellants' counsel consents to the requested extension.
6. There is good cause to grant the requested extension.

WHEREFORE the Respondent prays for an Order extending the time in which to serve and file the Respondent's initial brief and designation of matter to be included in the record on appeal until October 23, 2015.

Respectfully submitted,



Andrew S. Radeker  
S.C. Bar No. 73743  
Harrison & Radeker, P.A.  
Post Office Box 50143  
Columbia, South Carolina 29250  
(803) 779-2211  
Attorney for Respondent

September 23, 2015

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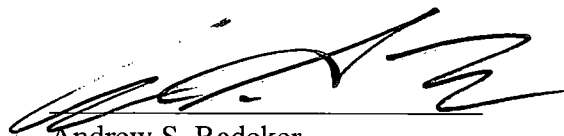
Todd Chas, Jacara Chas, Marsh Winds Owners Association, Inc. a/k/a Marsh Winds  
Horizontal Property Regime, and The Marshland Communities, LLC, Defendants,

Of whom Todd Chas and Jacara Chas are the.....Appellants.

PROOF OF SERVICE

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

William A. Scott, Esq.  
Pedersen & Scott, P.C.  
775 St. Andrews Blvd.  
Charleston, SC 29407



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Attorney for Respondent

September 23, 2015

LAW OFFICES  
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September 23, 2015

**VIA HAND DELIVERY**

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

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SEP 23 2015

Re: D.A. Morgan Price v. Todd Chas, et al.  
Appellate Case No. 2015-000940

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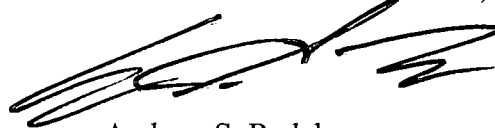
Dear Ms. Kitchings:

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 thereof 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: William A. Scott, Esq.