

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Charles B. Simmons, Circuit Court Judge

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Case No. 2012-CP-23-04064  
Appellate Case No. 2015-001909

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**RECEIVED**  
OCT 07 2015  
SC Court of Appeals

Piedmont Natural Gas Company, Inc., ..... Appellant,

v.

Richeous Smith, *et al.*, ..... Respondents.

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MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF  
AND DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD

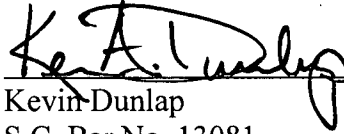
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The Appellant, Piedmont Natural Gas Company, Inc. (“PNG”), respectfully moves the Court pursuant to Rule 263(b), SCACR, for a thirty (30) day extension of time to file and serve its Initial Brief and Designation of Matter to be Included in the Record.

Appellant timely served its Notice of Appeal on September 9, 2015. Appellant’s Initial Brief and Designation of Matter are due on October 9, 2015. Due to various conflicts including, but not limited to, the undersigned counsel’s travel to the Philippines to conduct depositions, Appellant respectfully requests a thirty (30)-day extension of time in which to file and serve its Initial Brief and Designation of Matter to be Included in the Record from October 9, 2015 to November 8, 2015. Appellant has conferred with counsel for Respondents, including David

Ward, Erin Culbertson, Paul McKee, and Kelly Woody; and these counsel agree to the requested extension.

Respectfully submitted this the 2nd day of October, 2015.

A handwritten signature in black ink, appearing to read "Kevin Dunlap", is written over a horizontal line.

Kevin Dunlap  
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*Attorney for Appellant*

THE STATE OF SOUTH CAROLINA  
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**CERTIFICATE OF SERVICE**

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I certify that I have served the MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD on counsel of record in this action as well as the Clerk of Greenville County Court of Common Pleas by depositing a copy of the same in the United States Mail, postage prepaid, addressed as follows:

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*Attorney for Respondent State of South Carolina*

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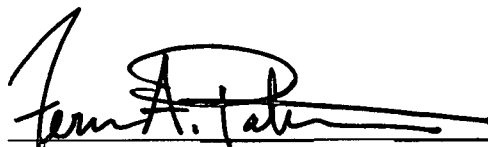
Zachery Arnold  
460 Durham Rd.  
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*Unrepresented Respondent Other Condemnee*

Eric Rogers  
10 Fort Dr.  
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Tonya S. Turner  
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Snellville, GA 30039  
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LaTasha D. Terry  
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This the 2nd day of October, 2015.

A handwritten signature in black ink, appearing to read "Jean A. Adams", written over a horizontal line.

Parker Poe Adams & Bernstein LLP



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*Partner*  
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October 2, 2015

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Via U.S. Mail and E-mail (dgreene@sccourts.org)

Diane Greene  
South Carolina Court of Appeals, Clerk's Office  
Post Office Box 11629  
Columbia, South Carolina 29211

Re: ***Piedmont Natural Gas Co. v. Richeous Smith, et al.***  
**Appellate Case No. 2015-001909**  
**Motion for Extension of Time**

Dear Ms. Greene:

I am enclosing herein a Motion for Extension of Time to File the Initial Brief and Designation of Matter to Be Included in the Record in the above-referenced matter.

Sincerely,

Kevin A. Dunlap  
S.C. Bar No. 13081

*Attorney for Piedmont Natural Gas Co.*

KAD:fap

Enclosure

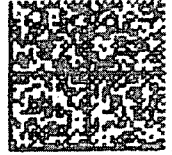
cc: David B. Ward  
Erin Culbertson  
Paul Andrew McKee, III  
Kelley Y. Woody, Esquire  
A. Lance Crick, Esquire  
Wylie W. Clarkson, Esquire  
Charles N. Griffin, III, Esquire  
Mary Elizabeth (Mary Beth) Campbell, Esquire  
Jeffrey D. Wile, Esquire  
Alan Wilson, South Carolina Attorney General  
John H. Magill, State Director of the South Carolina Department of Mental Health

PPAB 2947186v1

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Ahmad S. Washington, Esquire  
Richard L. Jackson, Esquire  
CT Corporation System, Registered Agent for Discover Bank and GE Commercial  
Finance Business Property  
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Jerome Smith  
Ettie Pearl Booker  
Wilford Daniels  
Terrance Leslie, Jr.  
Terrell Leslie, Sr.  
Teaira Leslie  
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Terry Gilliam  
Jerry Gilliam  
Ira K. Carol  
Demetrius J. Gilliam  
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Donnette Gilliam Ortchere  
Angela Gilliam  
John Glavin, Sr.  
John Glavin, Jr.  
Miranda Glavin  
Jeffrey Glavin  
Yolanda Glavin  
James (Jimmy) Terry  
Pearlie Mae Terry  
Zachery Arnold



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