

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Honorable Charles B. Simmons, Jr., Circuit Court Judge

Case No.: 2012-CP-23-4064

RECEIVED  
OCT 15 2015  
SC Court of Appeals

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

v.

Richeous Smith, Worthly Smith a/k/a, Worley Smith, Pearl Terry, Ethel Butler, Tweety Smith a/k/a Tweety Smith Harris, Doreth Smith, Fletcher Lee Harris, Alma Williams Smith, James R. Smith, Loree Smith, Gene A. Smith, Adolf Smith, Janie Sue Smith, Samuel Paul Smith, Ruby Smith Mansell, Buford Mansell, Ethel Mae Smith, Wilson Smith, Patrick R. Smith, Reginald Lamont Smith, Eric Smith, Christine Smith Dawkins, William G. Dawkins, Alma Renee Smith Murry, Sharai Smith Brock, Robert Lee Smith, Melissa F. Smith, Rosalyn Annette Steven, Edith Smith Foster, George Waymon Foster, Bridgette Smith Blassingame, Tara Smith, Waymon Odell Smith, Martha Miller Smith, Calvin Lee Smith, Reece W. Smith, Raymond Eddie Smith, Michael Smith, Odell Smith, Dorothy Smith Pearson, Gary Pearson, Jerome Smith, Jaygo Terry, Ida Terry, Mack Terry, Zone Terry, Leola Terry Smith, James Smith, J. P. Terry, David Brayvelle Terry, Ettie Pearl Booker, Tecora O. Terry Mason, Odell Mason, Lenora Holley, Dorothy Terry Sheppard, Orangelee Sheppard, Vernon Sheppard, Kasandra Sheppard Jenkins, Karen Sheppard Spates, Theodore Terry, Sr., Gracie Terry, Kelvin F. Terry, Theodore Terry, Jr., Keith Terry, Leola Terry Daniels, Wilford Daniels, Terrance Leslie, Sr., Derrick McGee, Jr., Fred Smith, Jr., Mannell Terry, Patricia Terry, Sheila Terry, Barbara Evans, Leonard Evans, Linda Evans, Thomas Evans, Johnny R. Williams, Connie Evans, Michael Evans, Iola Terry Cox, William Henry Cox, Johnny F. Cox, Joyce A. Smith, Anthony Cox, Alfred Cox, J. Henry Cox, Charlette J. Cox, Charles J. Cox, Michael Cox, Supearl Terry Gilliam a/k/a Supearl Terry Gilliam Miranda, Eugene Gilliam, Terry Gilliam, Jerry Gilliam, Warren Gilliam, Eugene Gilliam, Jr., Melvin Gilliam, Rodney Gilliam, Cindy Gilliam, Shakima Gilliam, Carmella Cottom, Nina Gilliam, Vermell Gilliam Phillips, Shaynise Alston, John Gilliam, Donald Gilliam, Sr., Leunette Gilliam, Donnette Gilliam Ortchere, Leslie Gilliam Peter, Angela Gilliam, Donald E. Gilliam, Raymond T. Gilliam, Juan Miranda, Carmen Miranda a/k/a Carmen Miranda Glavin, John Glavin, Sr., John Glavin, Jr., Miranda Glavin, Jeffrey Glavin, Yolanda Glavin, Ezell Terry, Magaline Terry, Leroy Terry, Kenneth Terry, James (Jimmy) Terry, Pearl Mae Terry,

Winnie L. Terry Anderson, Furman Anderson, Tommy Anderson, Abigail Dodd, Angela Reid, Sandra McDowell, Harold Anderson, Mary Ann Davis, Charlene Peaks, Albert Anderson, Paul Terry, Betty Jo Terry, Donald E. Terry, Deloris I. Terry, Paul A. Terry, Mark G. Terry, Terry Sholer, Jamie Terry, James O.C. Smith, Pauline Smith, Gloria Gore, Paul Smith, Ethel Allen, Desiree Golden, Pauline Workman, Brenda Moulhem, Eric Rogers, Tonya S. Turner, LaTasha D. Terry, and if any of the aforementioned be deceased, then their heirs, successors, devisees, distributees, Administrators, Executors and Personal Representatives, and any party claiming by or through them, The United States of America, acting by and through its agency, the Internal Revenue Service, The United States of America, acting by and through its agency the United States Department of Justice, The South Carolina Department of Revenue, The South Carolina Department of Mental Health, The State of South Carolina, Bullhead Investments, LLC, Arrow Financial Services, LLC, Sharonview Federal Credit Union, Discover Bank, Zachery Arnold, GE Commercial Finance Business Property Corporation, Midland Funding, LLC, Greenville County, John Doe and Mary Roe, being fictitious names used to represent all persons and condemnees whose true names are not known, including the heirs, successors, devisees, distributees, Administrators, Executors and Personal Representatives of any of the above named Landowners and Other Condemnees who may be deceased; and also all Condemnees whose names are not known, including heirs, infants, persons under disability and persons who may be in Military service, who claim, or may claim, an interest in the property being condemned, and also all other persons unknown, claiming any right, title, estate, interest in or lien upon the real estate described in the Condemnation Notice and Tender of Payment herein, said property being identified as a portion of Greenville County Tax Map Numbers 0531010102100 and 0531010102101,.....Respondents.

Of whom:

Ethel Allen; Shaynise Alston; Harold Anderson; Tommy Anderson; Bridgette Smith Blassingame; Sharai Smith Brock; Carmella Cottom; Alfred Cox; Anthony Cox; Mary Ann Davis; William G. Dawkins; Abigail Dodd; Linda Evans; Michael Evans; Thomas Evans; Chavonte Gilliam; Cindy Gilliam; Derrick Gilliam; Donald E. Gilliam, Jr.; John L. Gilliam; Lakisha Gilliam; Latonya Gilliam; Leunette Gilliam; Mattie M. Gilliam; Nina Gilliam; Raymond T. Gilliam; Rodney Gilliam; Shakima Gilliam; Warren Gilliam; Desiree Golden; Gloria Gore; Lenora Holley; Kasandra Sheppard Jenkins; Terrance Leslie, Sr.; Sandra McDowell; Derrick McGee, Jr.; Brenda Moulhem; Alma Rene Smith Murry; Charlene Peake; Leslie Gilliam Peter; Angela Reid; Orangelee Sheppard; Vernon Lee Sheppard; Charles Terry Sholer; Calvin Smith; Eric Smith; Fred Smith, Jr.; Gene A. Smith; James R. Smith; Joyce A. Smith; Loree Smith; Martha Miller Smith; Patrick Smith; Paul Smith; Reginald Lamont Smith; Tara Smith; Karen Regenia Spates; Rosalyn Annette Steven; Betty Jo Terry; Donald E. Terry; Deloris I. Terry; Gracie Terry; Jamie Terry; Keith Terry; Kelvin F. Terry; Leroy Terry; Mark G. Terry; Paul Terry, Jr.; Theodore Terry, Jr.; Porsha Williams; and Pauline Workman.....Respondents/Appellants,

Piedmont Natural Gas Company, Inc.; Richeous Smith (deceased); Worthly Smith a/k/a Worley Smith (deceased); Pearl Terry (deceased); Ethel Butler (deceased); Tweety Smith a/k/a Tweety Smith Harris (deceased); Doreth Smith (deceased); Fletcher Lee Harris (deceased); Alma Williams Smith (deceased); Adolf Smith (deceased); Janie Sue Smith (deceased); Samuel Paul Smith (deceased); Ruby Smith Mansell (deceased); Buford Mansell (deceased); Ethel Mae Smith (deceased); Wilson Smith (deceased); Christine Smith Dawkins (deceased); Robert Lee Smith (deceased); Melissa F. Smith; Edith Smith Foster (deceased); George Waymon Foster (deceased); Waymon Odell Smith (deceased); Reece W. Smith; Raymond Eddie Smith; Michael Smith; Odell Smith; Dorothy Smith Pearson (deceased); Gary Pearson (deceased); Jerome Smith; Jaygo Terry (deceased); Ida Terry (deceased); Mack Terry (deceased); Zone Terry (deceased); Leola Terry Smith (deceased); James Smith (deceased); J. P. Terry (deceased); David Brayvelle Terry (deceased); Ettie Pearl Booker; Tecora O. Terry Mason (deceased); Odell Mason (deceased); Dorothy Terry Sheppard (deceased); Theodore Terry, Sr. (deceased); Leola Terry Daniels (deceased); Wilford Daniels; Terrance Leslie, Sr. (deceased); Terrance Leslie, Jr.; Terrell Leslie; Teaira Leslie; Mannell Terry (deceased); Patricia Terry; Sheila Terry; Barbara Evans (deceased); Leonard Evans (deceased); Johnny R. Williams (deceased); Donald Ray Gilliam (deceased); Connie Evans (deceased); Iola Terry Cox (deceased); William Henry Cox (deceased); Johnny F. Cox; J. Henry Cox (deceased); Charlette J. Cox (deceased); Charles J. Cox (deceased); Michael Cox (deceased); Supearl Terry Gilliam a/k/a Supearl Terry Gilliam Miranda (deceased); Eugene Gilliam (deceased); Terry Gilliam; Jerry Gilliam; Eugene Gilliam, Jr. (deceased); Melvin Gilliam (deceased); Rodney Gilliam (deceased); Vermell Gilliam Phillips (deceased); Donald Gilliam, Sr. (deceased); Donnette Gilliam Ortchere; Angela Gilliam; Juan Miranda (deceased); Carmen Miranda a/k/a Carmen Miranda Glavin (deceased); John Glavin, Sr.; John Glavin, Jr.; Miranda Glavin; Jeffrey Glavin; Yolanda Glavin; Ezell Terry (deceased); Magaline Terry (deceased); Leroy Terry; Kenneth Terry; James (Jimmy) Terry; Pearlie Mae Terry; Winnie L. Terry Anderson (deceased); Furman Anderson (deceased); Albert Anderson (deceased); Paul Terry (deceased); James O. C. Smith (deceased); Pauline Smith (deceased); Ira K. Carroll; Demetrius J. Gilliam; Kehiminnie S. Gilliam; Bianca S. Gilliam; Eric Rogers; Tonya S. Turner; LaTasha D. Terry; and if any of the aforementioned be deceased, then their heirs, successors, devisees, distributes, Administrators, Executors, and Personal Representatives, and any party claiming by or through them; The United States of America, acting by and through its agency, the Internal Revenue Service; The United States of America, acting by and through its agency, the United States Department of Justice; The South Carolina Department of Revenue; The South Carolina Department of Mental Health; The State of South Carolina; Bullhead Investments, LLC; Arrow Financial Services, LLC; Sharonview Federal Credit Union; Discover Bank; Zachery Arnold; GE Commercial Finance Business Property Corporation; Midland Funding, LLC; Greenville County; John Doe and Mary Roe, being fictitious names used to represent all persons and landowners whose true names are not known, including the heirs, successors, devisees, distributes, Administrators, and Personal Representatives of any of the above-named Landowners and Lienholders who may be deceased; and also all landowners whose names are not known, including heirs, infants, persons under disability and persons who may be in military service, who claim, or may claim, an interest in the property at issue in this matter, and also all other persons unknown, claiming any right, title estate, interest in, or lien

upon the property described in the Lis Pendens herein, said property being identified as a portion of Greenville County Tax Map Numbers 0531010102100 and 0531010102101,.....Appellants/Respondents.

---

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

---

Ethel Allen, Shaynise Alston, Harold Anderson, Tommy Anderson, Bridgette Smith Blassingame, Sharai Smith Brock, Carmella Cottom, Alfred Cox, Anthony Cox, Mary Ann Davis, William G. Dawkins, Abigail Dodd, Linda Evans, Michael Evans, Thomas Evans, Chavonte Gilliam, Cindy Gilliam, Derrick Gilliam, Donald E. Gilliam, Jr., John L. Gilliam, Lakisha Gilliam, Latonya Gilliam, Leunette Gilliam, Mattie M. Gilliam, Nina Gilliam, Raymond T. Gilliam, Rodney Gilliam, Shakima Gilliam, Warren Gilliam, Desiree Golden, Gloria Gore, Lenora Holley, Kasandra Sheppard Jenkins, Terrance Leslie, Sr., Sandra McDowell, Derrick McGee, Jr., Brenda Moulhem, Alma Rene Smith Murry, Charlene Peake, Leslie Gilliam Peter, Angela Reid, Orangelee Sheppard, Vernon Lee Sheppard, Charles Terry Sholer, Calvin Smith, Eric Smith, Fred Smith, Jr., Gene A. Smith, James R. Smith, Joyce A. Smith, Loree Smith, Martha Miller Smith, Patrick Smith, Paul Smith, Reginald Lamont Smith, Tara Smith, Karen Regenia Spates, Rosalyn Annette Steven, Betty Jo Terry, Donald E. Terry, Deloris I. Terry, Gracie Terry, Jamie Terry, Keith Terry, Kelvin F. Terry, Leroy Terry, Mark G. Terry, Paul Terry, Jr., Theodore Terry, Jr., Porsha Williams, and Pauline Workman (hereinafter the "Smith Family") 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 on the Record.

The Smith Family timely served its Notice of Appeal on September 15, 2015. The Smith Family's Initial Brief and Designation of Matter are due on October 15, 2015. Due to the complexity of the matter and the logistics of communicating with such a large number of parties, as well as other deadlines and obligations of the undersigned counsel, the Smith Family 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 15, 2015, to November 14, 2015. The Smith Family has conferred with opposing counsel, including Kevin Dunlap, Michael Chambers, Paul McKee, and Kelly Woody, and these counsel agree to the requested extension.

Respectfully submitted this 13<sup>th</sup> day of October, 2015.



Erin Culbertson (SC Bar # 68271)  
**KEHL CULBERTSON ANDRIGHETTI &  
KORNFELD, LLC**  
114 Manly St.  
Greenville, SC 29601  
864/370-8222 (p) 864/370-8227 (f)  
[erin@palmettolawfirm.com](mailto:erin@palmettolawfirm.com)

David B. Ward  
**HORTON, DRAWDY, WARD, MULLINAX  
& FARRY, P.A.**  
307 Pettigru St.  
Greenville, SC 29601  
[dward@hortonlawfirm.net](mailto:dward@hortonlawfirm.net)

*Attorneys for the Smith Family  
Respondents/Appellants*

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Honorable Charles B. Simmons, Jr., Circuit Court Judge

---

Case No.: 2012-CP-23-4064

---

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

v.

Richeous Smith, Worthy Smith a/k/a, Worley Smith, Pearl Terry, Ethel Butler, Tweety Smith a/k/a Tweety Smith Harris, Doreth Smith, Fletcher Lee Harris, Alma Williams Smith, James R. Smith, Loree Smith, Gene A. Smith, Adolf Smith, Janie Sue Smith, Samuel Paul Smith, Ruby Smith Mansell, Buford Mansell, Ethel Mae Smith, Wilson Smith, Patrick R. Smith, Reginald Lamont Smith, Eric Smith, Christine Smith Dawkins, William G. Dawkins, Alma Renee Smith Murry, Sharai Smith Brock, Robert Lee Smith, Melissa F. Smith, Rosalyn Annette Steven, Edith Smith Foster, George Waymon Foster, Bridgette Smith Blassingame, Tara Smith, Waymon Odell Smith, Martha Miller Smith, Calvin Lee Smith, Reece W. Smith, Raymond Eddie Smith, Michael Smith, Odell Smith, Dorothy Smith Pearson, Gary Pearson, Jerome Smith, Jaygo Terry, Ida Terry, Mack Terry, Zone Terry, Leola Terry Smith, James Smith, J. P. Terry, David Brayville Terry, Ettie Pearl Booker, Tecora O. Terry Mason, Odell Mason, Lenora Holley, Dorothy Terry Sheppard, Orangelee Sheppard, Vernon Sheppard, Kasandra Sheppard Jenkins, Karen Sheppard Spates, Theodore Terry, Sr., Gracie Terry, Kelvin F. Terry, Theodore Terry, Jr., Keith Terry, Leola Terry Daniels, Wilford Daniels, Terrance Leslie, Sr., Derrick McGee, Jr., Fred Smith, Jr., Mannell Terry, Patricia Terry, Sheila Terry, Barbara Evans, Leonard Evans, Linda Evans, Thomas Evans, Johnny R. Williams, Connie Evans, Michael Evans, Iola Terry Cox, William Henry Cox, Johnny F. Cox, Joyce A. Smith, Anthony Cox, Alfred Cox, J. Henry Cox, Charlette J. Cox, Charles J. Cox, Michael Cox, Supearl Terry Gilliam a/k/a Supearl Terry Gilliam Miranda, Eugene Gilliam, Terry Gilliam, Jerry Gilliam, Warren Gilliam, Eugene Gilliam, Jr., Melvin Gilliam, Rodney Gilliam, Cindy Gilliam, Shakima Gilliam, Carmella Cottom, Nina Gilliam, Vermell Gilliam Phillips, Shaynise Alston, John Gilliam, Donald Gilliam, Sr., Leunette Gilliam, Donnette Gilliam Ortchere, Leslie Gilliam Peter, Angela Gilliam, Donald E. Gilliam, Raymond T. Gilliam, Juan Miranda, Carmen Miranda a/k/a Carmen Miranda Glavin, John Glavin, Sr., John Glavin, Jr., Miranda Glavin, Jeffrey Glavin, Yolanda Glavin, Ezell Terry, Magaline Terry, Leroy Terry, Kenneth Terry, James (Jimmy) Terry, Pearlise Mae Terry, Winnie L. Terry Anderson, Furman Anderson, Tommy Anderson, Abigail Dodd, Angela Reid, Sandra McDowell, Harold Anderson, Mary Ann Davis, Charlene Peaks, Albert Anderson, Paul Terry, Betty Jo Terry, Donald E. Terry, Deloris I. Terry, Paul A. Terry, Mark G. Terry, Terry Sholer,

Jamie Terry, James O.C. Smith, Pauline Smith, Gloria Gore, Paul Smith, Ethel Allen, Desiree Golden, Pauline Workman, Brenda Moulhem, Eric Rogers, Tonya S. Turner, LaTasha D. Terry, and if any of the aforementioned be deceased, then their heirs, successors, devisees, distributees, Administrators, Executors and Personal Representatives, and any party claiming by or through them, The United States of America, acting by and through its agency, the Internal Revenue Service, The United States of America, acting by and through its agency the United States Department of Justice, The South Carolina Department of Revenue, The South Carolina Department of Mental Health, The State of South Carolina, Bullhead Investments, LLC, Arrow Financial Services, LLC, Sharonview Federal Credit Union, Discover Bank, Zachery Arnold, GE Commercial Finance Business Property Corporation, Midland Funding, LLC, Greenville County, John Doe and Mary Roe, being fictitious names used to represent all persons and condemnees whose true names are not known, including the heirs, successors, devisees, distributees, Administrators, Executors and Personal Representatives of any of the above named Landowners and Other Condemnees who may be deceased; and also all Condemnees whose names are not known, including heirs, infants, persons under disability and persons who may be in Military service, who claim, or may claim, an interest in the property being condemned, and also all other persons unknown, claiming any right, title, estate, interest in or lien upon the real estate described in the Condemnation Notice and Tender of Payment herein, said property being identified as a portion of Greenville County Tax Map Numbers 0531010102100 and 0531010102101,.....Respondents.

Of whom:

Ethel Allen; Shaynise Alston; Harold Anderson; Tommy Anderson; Bridgette Smith Blassingame; Sharai Smith Brock; Carmella Cottom; Alfred Cox; Anthony Cox; Mary Ann Davis; William G. Dawkins; Abigail Dodd; Linda Evans; Michael Evans; Thomas Evans; Chavonte Gilliam; Cindy Gilliam; Derrick Gilliam; Donald E. Gilliam, Jr.; John L. Gilliam; Lakisha Gilliam; Latonya Gilliam; Leunette Gilliam; Mattie M. Gilliam; Nina Gilliam; Raymond T. Gilliam; Rodney Gilliam; Shakima Gilliam; Warren Gilliam; Desiree Golden; Gloria Gore; Lenora Holley; Kasandra Sheppard Jenkins; Terrance Leslie, Sr.; Sandra McDowell; Derrick McGee, Jr.; Brenda Moulhem; Alma Rene Smith Murry; Charlene Peake; Leslie Gilliam Peter; Angela Reid; Orangelee Sheppard; Vernon Lee Sheppard; Charles Terry Sholer; Calvin Smith; Eric Smith; Fred Smith, Jr.; Gene A. Smith; James R. Smith; Joyce A. Smith; Loree Smith; Martha Miller Smith; Patrick Smith; Paul Smith; Reginald Lamont Smith; Tara Smith; Karen Regenia Spates; Rosalyn Annette Steven; Betty Jo Terry; Donald E. Terry; Deloris I. Terry; Gracie Terry; Jamie Terry; Keith Terry; Kelvin F. Terry; Leroy Terry; Mark G. Terry; Paul Terry, Jr.; Theodore Terry, Jr.; Porsha Williams; and Pauline Workman.....Respondents/Appellants,

Piedmont Natural Gas Company, Inc.; Richeous Smith (deceased); Worthy Smith a/k/a Worley Smith (deceased); Pearl Terry (deceased); Ethel Butler (deceased); Tweety Smith a/k/a Tweety Smith Harris (deceased); Doreth Smith (deceased); Fletcher Lee Harris (deceased); Alma Williams Smith (deceased); Adolf Smith (deceased); Janie Sue Smith (deceased); Samuel Paul Smith (deceased); Ruby,Smith Mansell (deceased); Buford Mansell (deceased); Ethel Mae Smith (deceased); Wilson Smith (deceased); Christine Smith Dawkins (deceased); Robert Lee Smith (deceased); Melissa F.

Smith; Edith Smith Foster (deceased); George Waymon Foster (deceased); Waymon Odell Smith (deceased); Reece W. Smith; Raymond Eddie Smith; Michael Smith; Odell Smith; Dorothy Smith Pearson (deceased); Gary Pearson (deceased); Jerome Smith; Jaygo Terry (deceased); Ida Terry (deceased); Mack Terry (deceased); Zone Terry (deceased); Leola Terry Smith (deceased); James Smith (deceased); J. P. Terry (deceased); David Brayvelle Terry (deceased); Ettie Pearl Booker; Tecora O. Terry Mason (deceased); Odell Mason (deceased); Dorothy Terry Sheppard (deceased); Theodore Terry, Sr. (deceased); Leola Terry Daniels (deceased); Wilford Daniels; Terrance Leslie, Sr. (deceased); Terrance Leslie, Jr.; Terrell Leslie; Teaira Leslie; Mannell Terry (deceased); Patricia Terry; Sheila Terry; Barbara Evans (deceased); Leonard Evans (deceased); Johnny R. Williams (deceased); Donald Ray Gilliam (deceased); Connie Evans (deceased); Iola Terry Cox (deceased); William Henry Cox (deceased); Johnny F. Cox; J. Henry Cox (deceased); Charlette J. Cox (deceased); Charles J. Cox (deceased); Michael Cox (deceased); Supearl Terry Gilliam a/k/a Supearl Terry Gilliam Miranda (deceased); Eugene Gilliam (deceased); Terry Gilliam; Jerry Gilliam; Eugene Gilliam, Jr. (deceased); Melvin Gilliam (deceased); Rodney Gilliam (deceased); Vermell Gilliam Phillips (deceased); Donald Gilliam, Sr. (deceased); Donnette Gilliam Ortchere; Angela Gilliam; Juan Miranda (deceased); Carmen Miranda a/k/a Carmen Miranda Glavin (deceased); John Glavin, Sr.; John Glavin, Jr.; Miranda Glavin; Jeffrey Glavin; Yolanda Glavin; Ezell Terry (deceased); Magaline Terry (deceased); Leroy Terry; Kenneth Terry; James (Jimmy) Terry; Pearlie Mae Terry; Winnie L. Terry Anderson (deceased); Furman Anderson (deceased); Harold Anderson; Albert Anderson (deceased); Paul Terry (deceased); James O. C. Smith (deceased); Pauline Smith (deceased); Ira K. Carroll; Demetrius J. Gilliam; Kehiminnie S. Gilliam; Bianca S. Gilliam; Eric Rogers; Tonya S. Turner; LaTasha D. Terry; and if any of the aforementioned be deceased, then their heirs, successors, devisees, distributes, Administrators, Executors, and Personal Representatives, and any party claiming by or through them; The United States of America, acting by and through its agency, the Internal Revenue Service; The United States of America, acting by and through its agency, the United States Department of Justice; The South Carolina Department of Revenue; The South Carolina Department of Mental Health; The State of South Carolina; Bullhead Investments, LLC; Arrow Financial Services, LLC; Sharonview Federal Credit Union; Discover Bank; Zachery Arnold; GE Commercial Finance Business Property Corporation; Midland Funding, LLC; Greenville County; John Doe and Mary Roe, being fictitious names used to represent all persons and landowners whose true names are not known, including the heirs, successors, devisees, distributes, Administrators, and Personal Representatives of any of the above-named Landowners and Lienholders who may be deceased; and also all landowners whose names are not known, including heirs, infants, persons under disability and persons who may be in military service, who claim, or may claim, an interest in the property at issue in this matter, and also all other persons unknown, claiming any right, title estate, interest in, or lien upon the property described in the Lis Pendens herein, said property being identified as a portion of Greenville County Tax Map Numbers 0531010102100 and 0531010102101,.....Appellants/Respondents.

---

**CERTIFICATE OF SERVICE**

---

**RECEIVED**  
 OCT 15 2015  
 SC Court of Appeals

The undersigned hereby certifies that she has served the Smith Family's Motion for

Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record on counsel of record and parties in this action by depositing a copy of the same in the United States mail, postage prepaid, on October 13, 2015, addressed as follows:

Kevin Dunlap  
Parker Poe Adams & Bernstein, LLP  
100 Dunbar St., Suite 206  
Spartanburg, SC 29306  
[kevindunlap@parkerpoe.com](mailto:kevindunlap@parkerpoe.com)  
*Attorney for Piedmont Natural Gas Company, Inc.*

Michael S. Chambers  
121 Manly St., Suite B  
Greenville, SC 29601  
*Attorney for Piedmont Natural Gas Company, Inc.*

Paul A. McKee, III  
Hanover Title Agency, Inc.  
PO Box 2196  
Spartanburg, SC 29304  
[pmckee@hanovertitle.com](mailto:pmckee@hanovertitle.com)  
*Attorney for Reece W. Smith, Raymond Eddie Smith, Michael Smith, and Odell Smith*

Kelley Y. Woody  
PO Box 6432  
Columbia, SC 29260  
[kwoody@sc.rr.com](mailto:kwoody@sc.rr.com)  
*Guardian ad Litem for unknown Landowners*

A. Lance Crick  
US Attorney's Office  
55 Beattie Place, Suite 700  
Greenville, SC 29601  
*Attorney for the United States of America and the United States of America, acting by and through its Agency, the Internal Revenue Service*

Wylie W. Clarkson  
PO Box 287  
Columbia, SC 29202  
*Attorney for Midland Funding, LLC*

Charles N. Griffin, III  
PO Box 19806  
Raleigh, NC 27619  
*Attorney for Sharonview Federal Credit Union*

Mary E. Campbell  
SC Department of Revenue  
PO Box 12265  
Columbia, SC 29211  
*Attorney for SC Department of Revenue*

Jeffrey D. Wile  
County Attorney's Office  
301 University Ridge, Suite 2400  
Greenville, SC 29601  
*Attorney for County of Greenville*

Ettie Pearl Booker  
21 Cotswold Terrace  
Taylors, SC 29687  
*Landowner/Condemnee*

Johnny F. Cox  
6420 Guildford Rd.  
Rockford, IL 61107  
*Landowner/Condemnee*

Terry Gilliam  
47 Myers St.  
Buffalo, NY 14211  
*Landowner/Condemnee*

Jerry Gilliam  
5 Myers St.  
Buffalo, NY 14211  
*Landowner/Condemnee*

Donnette Gilliam Ortchere  
444 Emslie St.

Buffalo, NY 14212  
*Landowner/Condemnee*

Angela Gilliam  
445 Emslie St.  
Buffalo, NY 14212  
*Landowner/Condemnee*

James (Jimmy) Terry  
105 Bailey Rd.  
Greer, SC 29651  
*Landowner/Condemnee*

Pearlie Mae Terry  
PO Box 6942  
Greenville, SC 29606  
*Landowner/Condemnee*

John Glavin, Sr.  
21 Murray Terrace  
Tonawanda, NY 14150  
*Landowner/Condemnee*

Jeffrey Glavin  
21 Murray Terrace  
Tonawanda, NY 14150  
*Landowner/Condemnee*

Yolanda Glavin  
21 Murray Terrace  
Tonawanda, NY 14150  
*Landowner/Condemnee*

Miranda Glavin  
21 Murray Terrace  
Tonawanda, NY 14150  
*Landowner/Condemnee*

John Glavin, Jr.  
196 Moore St.  
Tonawanda, NY 14150  
*Landowner/Condemnee*

Kenneth Terry  
117 Sunnyglen Dr.

Greer, SC 29561  
*Landowner/Condemnee*

Eric Rogers  
10 Fort Dr.  
Simpsonville, SC 29681  
*Landowner/Condemnee*

Tonya S. Turner  
3494 Pinegate Trail  
Snellville, GA 30039  
*Landowner/Condemnee*

LaTasha D. Terry  
90 Preakness Dr.  
Alpharetta, GA 30022  
*Landowner/Condemnee*

Ira K. Carroll  
1348 Cochran Crossing  
McDonough, GA 30252  
*Landowner/Condemnee*

Demetrius J. Gilliam  
4328 Thyme Ave.  
Las Vegas, NV 89910  
*Landowner/Condemnee*

Kehimonnie S. Gilliam  
4328 Thyme Ave.  
Las Vegas, NV 89910  
*Landowner/Condemnee*

Bianca S. Gilliam  
4328 Thyme Ave.  
Las Vegas, NV 89910  
*Landowner/Condemnee*

Terrance Leslie, Jr.  
204 Herman St.  
Buffalo, NY 14211  
*Landowner/Condemnee*

Terrell Leslie, Sr.  
204 Herman St.

Buffalo, NY 14211  
*Landowner/Condemnee*

Teaira Leslie  
204 Herman St.  
Buffalo, NY 14211  
*Landowner/Condemnee*

Jerome Smith  
232 Sunnyside Dr.  
Greer, SC 29651  
*Landowner/Condemnee*

Wilford Daniels  
144 Sweet Ave.  
Buffalo, NY 14212  
*Landowner/Condemnee*

Patricia Terry  
211 Eagle St., #701  
Buffalo, NY 14204  
*Landowner/Condemnee*

Sheila Terry  
211 Eagle St., #701  
Buffalo, NY 14204  
*Landowner/Condemnee*

Melissa F. Smith  
142 Wilson Creek Rd.  
Iva, SC 29655  
*Landowner/Condemnee*

The Hon. Alan Wilson  
SC Attorney General  
PO Box 11549

Columbia, SC 29211

John H. Magill  
SC Dep't of Mental Health  
2414 Bull St.  
Columbia, SC 29202

Trace M. Dillon  
Arrow Financial Services, LLC  
1130 Hurricane Shoals Rd., Suite 600  
Lawrenceville, GA 30044

Ahmad S. Washington  
Arrow Financial Services, LLC  
1211 E. Morehead St.  
Charlotte, NC 28204

Richard L. Jackson  
Bullhead Investments, LLC  
1315 Westbrook Plaza Dr., Suite 100  
Winston-Salem, NC 27103

CT Corporation System  
Discover Bank  
2 Office Park Ct., Suite 103  
Columbia, SC 29223

CT Corporation System  
GE Commercial Finance Business Property  
Corporation  
2 Office Park Ct., Suite 103  
Columbia, SC 29223

Zachery Arnold  
460 Durham Td.  
Greer, SC 29650

Dated this 13<sup>th</sup> day of October, 2015.



---

Erin Culbertson  
Kehl Culbertson Andrighetti & Kornfeld, LLC

John L.B. Kehl  
Erin Culbertson

J.J. Andrighetti  
Alex Kornfeld



KEHL • CULBERTSON • ANDRIGHETTI • KORNFIELD  
— ATTORNEYS AT LAW —

October 13, 2015

The Hon. Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

RECEIVED  
OCT 15 2015  
SC Court of Appeals

Re: *Piedmont Natural Gas Co., Inc. v. Richeous Smith, et al.*  
*Appellate Case No. 2015-001909*

Ladies/Gentlemen:

Enclosed please find an original and copy of a Motion of Extension of Time in the above-captioned matter. I would appreciate if you would file the original and return the copy to me in the enclosed envelope. Should you have any questions or concerns, please don't hesitate to contact me.

With kind regards, I remain,

Yours very truly,

Erin Culbertson  
erin@palmettolawfirm.com

enclosures

cc: All counsel and parties as named on the Certificate of Service  
clients  
file

Kehl Culbertson Law Firm  
114 Manly St.  
Greenville, SC 29601

\$1.860  
US POSTAGE  
FIRST-CLASS  
FROM 29601  
OCT 13 2015  
stamps.com

**RECEIVED**  
OCT 15 2015  
SC Court of Appeals



The Hon. Jenny Abbott Kitchings  
South Carolina Court of Appeals  
PO Box 11629  
Columbia SC 29211-1629