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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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NOV 23 2015  
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Appellate Case No. 2015-001807

Devery A. Hale and Tina T. Hale,

Appellant,

v.

Winrose Homeowners' Association, Inc. and Regime Solutions, LLC

Respondents.

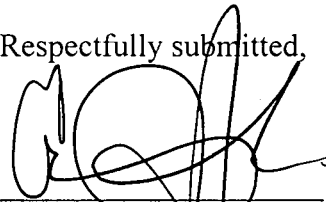
MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Respondent Regime Solutions, LLC requests an extension of the deadline for filing their initial brief and designation of matter.

“Statutes and rules of courts should be construed liberally in favor of the right to appeal.” *Wieters v. Bon-Secours-St. Francis Xavier Hosp., Inc.* 378 S.C. 160, 167, 662 S.E.2d 430, 434 (Ct. App. 2008), *See also; Haughton v. Order of United Commercial Travelers of Am.*, 108 S.C. 73, 74–75, 93 S.E. 393, 394 (1917); *O'Rourke v. Atl. Paint Co.*, 91 S.C. 399, 403, 74 S.E. 930, 931 (1912). Respondent Regime Solutions, LLC respectfully requests this extension on the grounds that counsel for Regime Solutions, LLC is combining practices with another law

practice which has required a significant amount of attorney time and resources. Additionally, counsel for Respondent has spent multiple entire days traveling to attend court hearings. This, along with the upcoming Thanksgiving holidays, has greatly reduced counsel's time to respond to Appellants' filings. Because Appellants are currently residing in the property that is at issue without bond or any other penalty against them no party is prejudiced by the Court granting Respondent and extension of time.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Eric C. Hale", written over a horizontal line.

Eric C. Hale, SC Bar #71768  
125 Executive Pointe Blvd.  
Columbia, South Carolina  
(803) 250-5252  
Attorney for Respondent

November 23, 2015

Columbia, SC 29210

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Motion for Extension on the Defendants by placing a copy of same in the United States mail with sufficient postage attached thereto and addressed as follows:

Brian Boger, Esq.  
1331 Elmwood Ave, Ste. #210  
Columbia, SC 29201

Stephanie Trotter, Esq.  
McCabe, Trotter & Beverly, PC  
P.O. Box 212069  
Columbia, SC 29221

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Elias Fain, Esq.

November 23, 2015

Columbia, SC 29205