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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

RECEIVED

Kristi Lea Harrington, Circuit Court Judge

DEC 03 2015

SC Court of Appeals

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.

APPELLANTS' MOTION FOR ENLARGEMENT OF TIME
TO SERVE AND FILE THEIR REPLY BRIEF

The Appellants, Todd Chas and Jacara Chas (hereinafter, "Appellants"), by and through the undersigned counsel, hereby move pursuant to Rule 263(b), SCACR, for a thirty (30) day enlargement of time, from December 3, 2015 to January 4, 2016, in which to serve and file the Appellants' Reply Brief. 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 December 3, 2015;
2. This is the second extension that the Appellants have sought in this case;

3. The undersigned is preparing for trial in a matter in the Court of Common Pleas that is scheduled to begin on December 7, 2015, preventing the timely completion of the Reply Brief;
4. There is good cause to grant the requested extension; and
5. Counsel for the Respondent has consented to this extension.

For the reasons stated above, Appellants respectfully request that the Court grant this Motion for Enlargement of Time to File Their Reply Brief.

November 30, 2015



William A. Scott
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Attorney for Appellants

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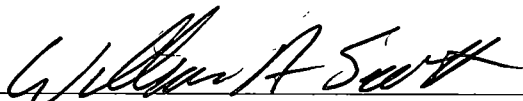
Todd Chas, Jacara Chas, Marsh Winds Owners Association, Inc. a/k/a Marsh Winds
Horizontal Property Regime, and The Marshland Communities, LLC, Defendants,

Of Whom Todd Chas and Jacara Chas are the Appellants.

PROOF OF SERVICE

I certify that I served the Appellants' Motion for Enlargement of Time to Serve and File
Their Reply Brief, by depositing a copy of it in the United States Mail, postage prepaid, on
November 30, 2015, addressed to counsel for Respondent, Andrew S. Radeker, Esq., Harrison &
Radeker, P.A., Post Office Box 50143, Columbia, SC 29250.

PEDERSEN & SCOTT, P.C.


William A. Scott
775 St. Andrews Blvd.
Charleston, SC 29407
Tel: (843) 556-5656
Attorney for Appellants

Dated: November 30, 2015
Charleston, South Carolina

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ATTORNEYS AT LAW

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November 30, 2015

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

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

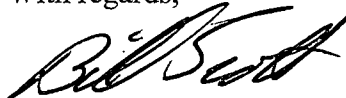
Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find an original and seven copies of the Appellants' Motion for Enlargement of Time to Serve and File their Reply Brief, with attached proof of service. Also enclosed is a check in the amount of \$25.00 in payment of the motion fee.

Kindly file this document and return a file-stamped copy to this office in the attached return addressed stamped envelope.

Please contact me if you have any questions.

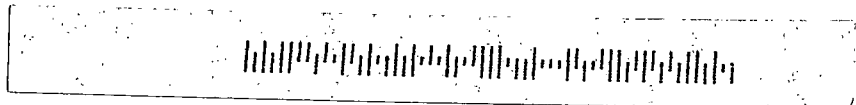
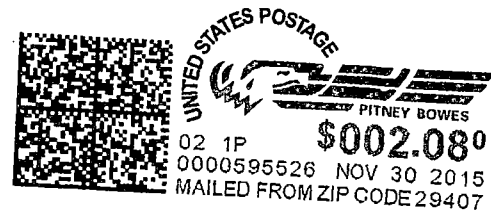
With regards,



William A. Scott

WAS/teb
Enclosures
cc: Andrew S. Radeker, Esq. (w/encs.)

William A. Scott, Esq.
Pedersen & Scott, P.C.
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Charleston, SC 29407



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