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DEC 11 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger L. Couch, Circuit Court Judge

Appellate Case No. 2015-002085
Case No. 2014-CP-10-4445

JACOB GREENSPAN,

Appellant,

v.

BROTHERS PROPERTY CORPORATION,
BROTHERS PROPERTY MANAGEMENT
CORPORATION, VICTOR FULLER, Individually and
in his official capacity, ANA REINA, Individually and
in her official capacity, and OLIVER ROOSKENS,
Individually and in his official capacity,

Defendants,

Of whom BROTHERS PROPERTY CORPORATION
and BROTHERS PROPERTY MANAGEMENT
CORPORATION are

Respondents.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Appellant Jacob Greenspan, proceeding pro se, hereby files this Motion for

Extension of Time to File Initial Brief and in support thereof states:

1. On September 29, 2015, Appellant served and filed the Notice of Appeal.
2. On October 14, 2015, Appellant filed a Motion for Leave of Court of

Appeals to File Motion Seeking Relief Under Rule 60(B), SCRCP. To date, Appellant's Motion has not been ruled upon by the Court.

3. In a letter dated October 19, 2015, Appellant was notified of the requirement that he file a Motion to Order the Transcript Outside of the Filing Deadlines within ten (10) days of the date of the letter as a result of the expiration of the time period in which he was required to order the transcript.

4. On October 29, 2015, Appellant provided the required Motion along with supporting documentation that demonstrated Respondents' had notified Appellant of the fact that they had ordered the transcript on October 1, 2015, and that they would provide him with a copy of the transcript as soon as it was received.

5. Under cover of the same motion, Appellant also provided the Court with a copy of the transcript that was received just prior to the filing of the motion.

6. On November 9, 2015, Appellant received the time-stamped copy of the transcript that was provided to the Court. Appellant interpreted this as a positive ruling on the required Motion to Order the Transcript Outside of the Filing Deadlines.

7. Accordingly, Appellant's deadline to serve and file his Initial Brief is December 9, 2015.

8. While it is understood that last-minute Motions for Extensions of Time are generally disfavored, Appellant is compelled to request an extension of an additional thirty (30) days to file his Initial Brief, up to and including January 8, 2016, in the protection of his interest in his appeal and his interest in seeing that his case be tried on its merits.

9. More specifically, through his continued research, Appellant has uncovered useful information on additional legal theories relevant to his appeal that will greatly serve him in his efforts to protect his interests.

10. Appellant's request is made for good cause and not for the purpose of

delay.

11. Appellant has at all times exercised diligence in handling his appeal and in his dealings with the Court.

12. Furthermore, Appellant's Motion is in compliance with Rule 240, SCACR.

For the reasons set forth above, Appellant respectfully requests that the Court grant him the additional thirty (30) days, up to and including January 8, 2016, to serve and file his Initial Brief.

Respectfully submitted by:



December 9, 2015

Jacob Greenspan
550 Harbor Cove Lane, #15H
Charleston, SC 29412
(843) 647-9277
Appellant, Pro Se

Other Counsel of Record:
Wendy L. Furhang (Fed. I.D. No. 9851)
Email: furhangw@jacksonlewis.com
John W. Sulau (Fed. I.D. No. 11613)
John.Sulau@jacksonlewis.com

JACKSON LEWIS P.C.
15 South Main Street, Suite 700
Greenville, SC 29601
Phone: 864-232-7000
Fax: 864-235-1381

ATTORNEYS FOR BROTHERS PROPERTY
CORPORATION AND BROTHERS PROPERTY
MANAGEMENT CORPORATION

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Roger L. Couch, Circuit Court Judge

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in her official capacity, and OLIVER ROOSKENS,
Individually and in his official capacity,

Defendants,

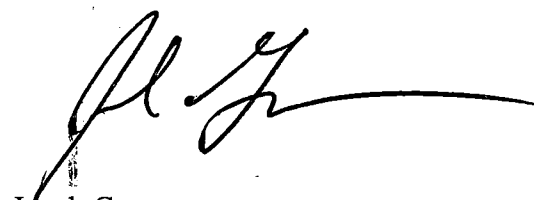
Of whom BROTHERS PROPERTY CORPORATION
and BROTHERS PROPERTY MANAGEMENT
CORPORATION are

Respondents.

PROOF OF SERVICE

I certify that I have served Appellant's MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF on BROTHERS PROPERTY CORPORATION and BROTHERS PROPERTY MANAGEMENT CORPORATION by way of the United States Postal Service, Certified Mail, on December 9, 2015, addressed to the attorney of record, Wendy L. Furhang, JACKSON LEWIS P.C., 15 South Main St., Suite 700, Greenville, SC 29601.

December 9, 2015



Jacob Greenspan
550 Harbor Cove Lane, #15H
Charleston, SC 29412
(843) 647-9277
Appellant, Pro Se

Other Counsel of Record:
Wendy L. Furhang (Fed. I.D. No. 9851)
Email: furhangw@jacksonlewis.com
John W. Sulau (Fed. I.D. No. 11613)
John.Sulau@jacksonlewis.com

JACKSON LEWIS P.C.
15 South Main Street, Suite 700
Greenville, SC 29601
Phone: 864-232-7000
Fax: 864-235-1381

ATTORNEYS FOR BROTHERS PROPERTY
CORPORATION AND BROTHERS PROPERTY
MANAGEMENT CORPORATION

December 9, 2015

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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DEC 11 2015

SC Court of Appeals

RE: Jacob Greenspan, Plaintiff/Appellant, v. Brothers Property Corporation; Brothers Property Management Corporation, Victor Fuller, Individually, and in his official capacity; Ana Reina, Individually, and in her official capacity; and Oliver Rooskens, Individually, and in his official capacity, Defendants, Of whom Brothers Property Corporation, and Brothers Property Management Corporation are Respondents.
Appellate Case No. 2015-002085

Dear Ms. Kitchings:

Enclosed for filing is Appellant's Motion for Extension of Time to File Initial Brief in the above case. Also enclosed are the following:

- (1) Proof of service of Appellant's Motion for Extension of Time to File Initial Brief on Respondents on December 9, 2015;
- (2) Six (6) copies of the motion for filing with the Court Clerk; and
- (3) The filing fee of \$25.

Sincerely,



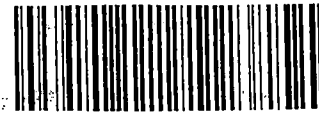
Jacob Greenspan
550 Harbor Cove Lane, #15H
Charleston, South Carolina 29412
(843) 647-9277
Appellant, Pro Se

cc: Wendy L. Furhang
JACKSON LEWIS P.C.
15 South Main Street, Suite 700
Greenville, SC 29601
Phone: 864-232-7000
Attorney for Appellees'

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