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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

DEC 18 2015

SC Court of Appeals

Charles B. Simmons, Circuit Court Judge

Appellate Case No. 2015-001909

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

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 Brayvell 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, Pearlmae Terry, Winnie L. Terry Anderson, Furman Anderson, Tommy Anderson, Abigail Dodd, Angela Reid, Sandra McDowell, Harold Anderson, Mary Ann Davis, Charlene Peake, 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, 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, Landowners,

and

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, and Greenville County, Other Condemnees,

and

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 053101010200 and 0531010102101, Unknown Claimants,

Of whom Ethel Allen, Shaynise Alson, Harold Anderson, Tommy Anderson, Bridgette Smith Blassingame, Sharai Smith Brock, Carmella Cottom, Alfred 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 TI 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 are the Respondents/Appellants,

and

Unknown landowners, Reece W. Smith, Raymond Eddie Smith, Michael Smith, Odell Smith, United States of America and the United States of America, acting by and through its Agency, the Internal Revenue Service, Midland Funding, LLC, Sharonview Federal Credit Union, SC Department of Revenue, County of Greenville, Arrow Financial Services, LLC, SC Dept. of

Mental Health, SC Attorney General, and Bullhead Investments, LLC, Zachery Arnold, Ettie Pearl Booker, Ira K. Carol, Johnny F. Cox, Wilford Daniels, Angela Gilliam, Bianca S. Gilliam, Demetrius J. Gilliam, Jerry Gilliam, Kehiminnie S. Gilliam, Terry Gilliam, John Glavin, Jr., John Glavin, Sr. Jeffrey Glavin, Miranda Glavin, Yolanda Glavin, Terrance Leslie, Terrell Leslie, Tearia Leslie, Donnette Ortchere, Jerome Smith, Melissa F. Smith, Michael Smith, James (Jimmy) Terry, Patricia Terry, Pearlie Mae Terry, and Sheila Terry are the Respondents.

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MOTION FOR EXTENSION OF TIME  
TO FILE RESPONSE BRIEFS  
FOR ALL PARTIES

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The Appellant/Respondent, Piedmont Natural Gas Company, Inc. ("PNG"), respectfully moves the Court pursuant to Rule 263(b), SCACR, on its own behalf and on behalf of the Respondents/Appellants and Respondents for a thirty (30) day extension of time to file and serve the Response Briefs for the Appellant/Respondent on its appeal and the Respondents/Appellants on their cross appeal. The extension request is being made in consideration of the approaching Christmas and New Year's Day holidays. No additional extension will be requested. With the thirty (30) day extension of time, the Response Briefs would be due by February 5, 2016. Counsel for Respondents/Appellants, David Ward, Erin Culbertson, and counsel for Respondents, Paul McKee, consent to the requested extension.

Respectfully submitted this the 18th day of December, 2015.

  
Kevin Dunlap  
S.C. Bar No. 13081  
Parker Poe Adams & Bernstein LLP  
100 Dunbar Street, Suite 206  
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(864) 591-2030  
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*with permission by  
Anibal Blautu*

*Attorney for Appellant/Respondent*

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Charles B. Simmons, Circuit Court Judge

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v.

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

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**CERTIFICATE OF SERVICE**

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I certify that I have caused to be served the MOTION FOR EXTENSION OF TIME TO FILE RESPONSE BRIEFS on counsel of record in this action by depositing a copy of the same in the United States Mail, postage prepaid, addressed as follows:

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*Attorney for Respondents/Appellants*

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*Guardian Ad Litem for Unknown Respondent Landowners*

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*Attorney for Respondent County of Greenville*

The Honorable Alan Wilson  
South Carolina Attorney General  
P.O. Box 11549  
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*Attorney for Respondent State of South Carolina*

South Carolina Department of Mental Health  
c/o John H. Magill, State Director  
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*State Director for Respondent South Carolina Department of Mental Health*

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*Attorney for Respondent Bullhead Investments, LLC*

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Columbia, SC 29223  
*Registered Agent for Discover Bank*

GE Commercial Finance Business Property Corporation  
c/o CT Corporation System  
2 Office Park Court, Suite 103  
Columbia, SC 29223  
*Registered Agent for GE Commercial Finance Business Property Corporation*

Jerome Smith  
232 Sunnyglen Dr.  
Greer, SC 29651

Ettie Pearl Booker  
21 Cotswold Terrace  
Taylors, SC 29687

Wilford Daniels  
144 Sweet Ave.  
Buffalo, NY 14212  
*Unrepresented Respondent Landowner*

Terrance Leslie, Jr.  
204 Herman St.  
Buffalo, NY 14211  
*Unrepresented Respondent Landowner*

Terrell Leslie, Sr.  
204 Herman St.  
Buffalo, NY 14211  
*Unrepresented Respondent Landowner*

Teaira Leslie  
204 Herman St.  
Buffalo, NY 14211  
*Unrepresented Respondent Landowner*

Patricia Terry  
211 Eagle St., #701  
Buffalo, NY 14204  
*Unrepresented Respondent Landowner*

Sheila Terry  
211 Eagle St., #701  
Buffalo, NY 14204  
*Unrepresented Respondent Landowner*

Johnny F. Cox  
6420 Guildford Rd.  
Rockford, IL 61107  
*Unrepresented Respondent Landowner*

Terry Gilliam  
47 Myers St.  
Buffalo, NY 14211  
*Unrepresented Respondent Landowner*

Jerry Gilliam  
5 Myers St.  
Buffalo, NY 14211  
*Unrepresented Respondent Landowner*

Ira K. Carol  
1348 Cochran Crossing  
McDonough, GA 30252  
*Unrepresented Respondent Landowner*

Demetrius J. Gilliam  
4328 Thyme Ave.  
Las Vegas, NV 89910  
*Unrepresented Respondent Landowner*

Kehimonnie S. Gilliam  
4328 Thyme Ave.  
Las Vegas, NV 89910  
*Unrepresented Respondent Landowner*

Bianca S. Gilliam  
4328 Thyme Ave.  
Las Vegas, NV 89910  
*Unrepresented Respondent Landowner*

Donnette Gilliam Ortchere  
444 Emslie St.  
Buffalo, NY 14212  
*Unrepresented Respondent Landowner*

Angela Gilliam  
445 Emslie St.  
Buffalo, NY 14212  
*Unrepresented Respondent Landowner*

John Glavin, Sr.  
21 Murray Terrace  
Tonawanda, NY 14150  
*Unrepresented Respondent Landowner*

John Glavin, Jr.  
196 Moore St.  
Tonawanda, NY 14150  
*Unrepresented Respondent Landowner*

Miranda Glavin  
21 Murray Terrace  
Tonawanda, N.Y. 14150  
*Unrepresented Respondent Landowner*

Jeffrey Glavin  
21 Murray Terrace  
Tonawanda, NY 14150  
*Unrepresented Respondent Landowner*

Yolanda Glavin  
21 Murray Terrace  
Tonawanda, NY 14150  
*Unrepresented Respondent Landowner*

James (Jimmy) Terry  
105 Bailey Rd.  
Greer, SC 29651  
*Unrepresented Respondent Landowner*

Pearlie Mae Terry  
P.O. Box 6942  
Greenville, SC 29606  
*Unrepresented Respondent Landowner*

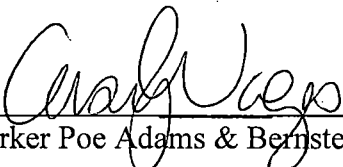
Zachery Arnold  
460 Durham Rd.  
Greer, SC 29650  
*Unrepresented Respondent Other Condemnee*

Eric Rogers  
10 Fort Dr.  
Simpsonville, SC 29681  
*Non-Respondent Landowner*

Tonya S. Turner  
3494 Pinegate Trail  
Snellville, GA 30039  
*Non-Respondent Landowner*

LaTasha D. Terry  
90 Preakness Dr.  
Alpharetta, GA 30022  
*Non-Respondent Landowner*

This the 18th day of December, 2015.

  
\_\_\_\_\_  
Parker Poe Adams & Bernstein LLP



**Fern A. Paterson**  
*Associate*  
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Charlotte, NC  
Columbia, SC  
Raleigh, NC  
Spartanburg, SC

December 18, 2015

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**SC Court of Appeals**

**Via Hand Delivery**

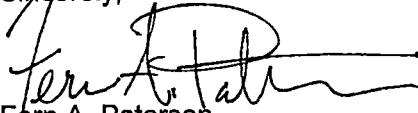
Diane Greene  
South Carolina Court of Appeals, Clerk's Office  
Post Office Box 11629  
Columbia, South Carolina 29211

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 Response Briefs for All Parties in the above-referenced matter, along with a \$25 filing fee.

Sincerely,



Fern A. Paterson  
S.C. Bar No. 101054

*Attorney for Piedmont Natural Gas Co.*

**Enclosures**

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

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Diane Greene  
December 18, 2015  
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Ahmad S. Washington, Esquire  
Gregory Cowan, Esquire  
Discover Bank (c/o CT Corporation System)  
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LaTasha D. Terry