

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

RECEIVED
JAN 11 2016
SC Court of Appeals

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 AND DESIGNATION OF
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Appellant Jacob Greenspan, proceeding pro se, hereby files this Motion for
Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record on
Appeal, 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.

3. On December 9, 2015, Appellant filed a Motion for Extension of Time to File Initial Brief, requesting a new deadline of January 8, 2016.

4. On December 14, 2015, Appellant received the Court's order, dated December 10, 2015, in which Appellant's Motion for Leave of Court of Appeals to File Motion Seeking Relief under Rule 60(b), SCRCF, was denied.

5. On December 17, 2015, Appellant received the Court's order, dated December 14, 2015, in which Appellant's Motion for Extension of Time to File Initial Brief was granted, extending his deadline for serving and filing his Initial Brief and Designation of Matter to be Included in the Record on Appeal to January 8, 2016.

6. While Appellant understands that last-minute Motions for Extensions of Time are generally disfavored, Appellant is compelled to request an another extension of an additional thirty (31) days to file his Initial Brief and Designation of Matter to be Included in the Record on Appeal, up to and including Monday, February 8, 2016.

7. Appellant has lost significant time that he otherwise would have dedicated to his Appeal and the preparation of his Initial Brief due to the recently passed end-of-year holiday season and his substantial and long-existing family and travel obligations typically associated with this time of the year.

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

9. Appellant has exercised, and will continue to exercise, diligence in handling his appeal and in his dealings with the Court.

10. 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 (31) days, up to and including Monday, February 8, 2016, to serve and file his Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted by:



January 8, 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
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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.

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, First-Class Mail, on January 8, 2016, addressed to the attorney of record, Wendy L. Furhang, JACKSON LEWIS P.C., 15 South Main St., Suite 700, Greenville, SC 29601.

[SIGNATURE BLOCK NEXT PAGE]

January 8, 2016



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)
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ATTORNEYS FOR BROTHERS PROPERTY
CORPORATION AND BROTHERS PROPERTY
MANAGEMENT CORPORATION

January 8, 2016

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

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JAN 11 2016

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 January 8, 2016;
- (2) Six (6) copies of the motion for filing with the Court Clerk; and
- (3) The filing fee of \$25.

Sincerely,

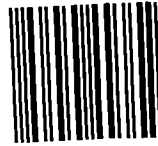


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Appellant, Pro Se

cc: Wendy L. Furhang
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Attorney for Appellees'



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