

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Concerned Riverchase Estate Owners, Andrew
Dodd, Heather Dodd and Charles Ratay Respondents,

v.

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Riverchase Estates Property Owners
Assoc., Inc.; LGI Land SC, LLC; LGI
Holdings, LLC; LGI Development, Inc.;
and Lexon Insurance Company, Inc. Appellants

SC Court of Appeals

AND

Concerned Riverchase Estate Owners, Clark,
Perry, Elder & White. Respondents,

v.

Riverchase Estates Property Owners Assoc., Inc.;
Woodforest Bank, N.A., LGI Land SC, LLC; LGI
Holdings, LLC; LGI Development, Inc.; and
Lexon Insurance Company, Inc. Defendants

Of whom Riverchase Estates Property Owners
Assoc., Inc.; LGI Land SC, LLC; LGI
Holdings, LLC; LGI Development, Inc.;
and Lexon Insurance Company, Inc. are the Appellants.

Appellate Case No. 2015-00193

The Honorable R. Knox McMahon
Lancaster County
Trial Court Case Nos. 2013CP2900649, 2014CP2900792

MOTION FOR EXTENSION TO FILE REPLY

COMES NOW appellants Riverchase Estates Property Owners
Assoc., Inc.; LGI Land SC, LLC; LGI Holdings, LLC; LGI
Development, Inc. and Lexon Insurance Company, Inc.

(collectively, "Appellants") through their undersigned counsel and pursuant to Rules 240 and 263(b), SCACR, and respectfully request an extension of time to serve and file a Reply to Respondents' Return¹ to Appellants' Petition for Rehearing served January 4, 2016 ("Reply").

Respondents served a Return to Appellants' Petition for Rehearing ("Return") on January 4, 2016. The current deadline for filing a Reply is Monday, January 11, 2016. Counsel received the Return on Thursday, January 7, 2016 and attended a continuing legal education seminar on Friday, January 8, 2016. Accordingly, counsel for Appellants has not had adequate time to review the Return and prepare an appropriate Reply as a result of competing deadlines and obligations from the date of receipt of the Return through the date of this Motion. Appellants respectfully request an extension of five (5) days to file and serve a Reply in this matter.

WHEREFORE, the undersigned counsel for Appellants respectfully requests a five-day extension in which to serve and file a Reply to the Respondents' Return to Appellants' Petition for Rehearing.

¹ Respondents' "Return" was improperly captioned a "Reply".

Respectfully submitted,

Date: January 11, 2016

By: W

W. Mark White
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SPENCER & SPENCER, P.A.
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ATTORNEYS FOR APPELLANTS

THE STATE OF SOUTH CAROLINA
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Respondents,

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SC Court of Appeals

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Trial Court Case No. 2013CP2900649, 2014CP2900792

PROOF OF SERVICE

I certify that I have served the Motion for Extension of
Time to File the Reply by depositing a copy in the United

States Mail, postage prepaid, on January 11, 2016, addressed
to counsel of record as follows:

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Date: January 11, 2016

By: W
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January 11, 2016

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

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SC Court of Appeals

Re: Concerned Riverchase Estate Owners, et al. v. Riverchase
Estates Property Owners Association, Inc., et al.
Appellate Case No.: 2015-00193

Dear Ms. Kitchings:

Enclosed please find an original and seven copies of the Motion for Extension of Time to File Reply and Proof of Service in the above referenced matter. Please file the originals with the records of your court and return a clocked copy in the enclosed envelope.

Thank you for your assistance in this matter.

Respectfully,

SPENCER & SPENCER, P.A.


W. Mark White

enclosures

cc: Chris Wren
Beth Richardson, Esq.
J. Cameron Halford, Esq.
Leland Greeley, Esq.

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To: The Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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FIRST CLASS