

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Roger L. Couch, Circuit Court Judge

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

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RECEIVED

FEB 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.

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MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF  
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

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

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

4. On January 8, 2016, Appellant filed a second Motion for Extension of Time to File Initial Brief, requesting a new deadline of February 8, 2016.

5. On January 19, 2016, Appellant received the Court's order, dated January 15, 2016, in which his deadline for serving and filing his Initial Brief and Designation of Matter to be Included in the Record on Appeal was extended to February 8, 2016. The Court's order expressly stated that no further extensions will be granted absent extraordinary circumstances.

6. Appellant understands that last-minute Motions for Extensions of Time are generally disfavored, and Appellant respects the Court's position. However, due to extraordinary financial circumstances, Appellant is unable to serve and file his Initial Brief and Designation of Matter to be Included in the Record on Appeal at this moment and is compelled to request an additional twenty-one (21) days to file his Initial Brief and Designation of Matter to be Included in the Record on Appeal, up to and including Monday, February 29, 2016.

7. Appellant has provided a screenshot of his bank account and is willing to answer further as it pertains to these matters, if necessary.

8. Appellant's request is made for good cause under extraordinary circumstances, and for the purpose of using the requested time to adequately resolve his financial circumstances. Delay is most certainly not in Appellant's interests.

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 twenty-one (21) days, up to and including Monday, February 29, 2016, to serve and file his Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted by:



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

February 8, 2016

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  
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**\$1.43**  
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**OVERDRAFT - 9299** **\$490.03<sup>f</sup>**  
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Show account number

<b>Summary</b>		<b>Payment information</b>	
Credit limit:	\$500.00	Next payment due date:	02/24/2016
Available credit:	\$9.97	Next payment amount:	\$25.00

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8:35:42 AM

Monday, February 8, 2016

February 2016

Su	Mo	Tu	We	Th	Fr	Sa
31	1	2	3	4	5	6
7	<b>8</b>	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	1	2	3	4	5
6	7	8	9	10	11	12

Date and time settings

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APPEAL FROM CHARLESTON COUNTY  
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Roger L. Couch, Circuit Court Judge

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BROTHERS PROPERTY CORPORATION,  
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in his official capacity, ANA REINA, Individually and  
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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]

February 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)  
Email: [furhangw@jacksonlewis.com](mailto:furhangw@jacksonlewis.com)  
John W. Sulau (Fed. I.D. No. 11613)  
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ATTORNEYS FOR BROTHERS PROPERTY  
CORPORATION AND BROTHERS PROPERTY  
MANAGEMENT CORPORATION

February 8, 2016

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

RECEIVED  
FEB 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 his 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 his Initial Brief on Respondents on February 8, 2016; and
- (2) Six (6) copies of the motion for filing with the Court Clerk.
- (3) Due to the circumstances discussed within Appellant's motion, the filing fee of \$25 will follow.

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'

