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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Charles B. Simmons, Circuit Court Judge

RECEIVED

FEB 26 2016

SC Court of Appeals

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, Pearlie Mae 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.

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

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 for an extension of time of thirty (30) days to file and serve the Reply Briefs for the Appellant/Respondent on its appeal and the Respondents/Appellants on their cross appeal. With the thirty (30) day extension of time, the Reply Briefs would be due by April 2, 2016. Counsel for Respondents/Appellants, David Ward and Erin Culbertson, consent to the requested extension.

Respectfully submitted this the 26th day of February, 2016.


Kevin Dunlap
S.C. Bar No. 13081
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with permission by


Attorney for Appellant/Respondent

THE STATE OF SOUTH CAROLINA
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APPEAL FROM GREENVILLE COUNTY
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SC Court of Appeals

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

v.

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

CERTIFICATE OF SERVICE

I certify that I have caused to be served the MOTION FOR EXTENSION OF TIME TO FILE REPLY 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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The Honorable Alan Wilson
South Carolina Attorney General
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Statutory Agent for Respondent Arrow Financial Services, LLC

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Statutory Agent 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
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Columbia, SC 29223
Registered Agent for GE Commercial Finance Business Property Corporation

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Taylors, SC 29687

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Buffalo, NY 14211

Terrell Leslie, Sr.
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Buffalo, NY 14211

Teaira Leslie
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Buffalo, NY 14211

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Buffalo, NY 14204

Sheila Terry
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Buffalo, NY 14204

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Jerry Gilliam
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Buffalo, NY 14211

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McDonough, GA 30252

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Kehiminnie S. Gilliam
4328 Thyme Ave.
Las Vegas, NV 89910

Bianca S. Gilliam
4328 Thyme Ave.
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Donnette Gilliam Ortchere
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Buffalo, NY 14212

Angela Gilliam
445 Emslie St.
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Tonawanda, NY 14150

John Glavin, Jr.
196 Moore St.
Tonawanda, NY 14150

Miranda Glavin
21 Murray Terrace
Tonawanda, N.Y. 14150

Jeffrey Glavin
21 Murray Terrace
Tonawanda, NY 14150

Yolanda Glavin
21 Murray Terrace
Tonawanda, NY 14150

James (Jimmy) Terry
105 Bailey Rd.
Greer, SC 29651

Pearlie Mae Terry
P.O. Box 6942
Greenville, SC 29606

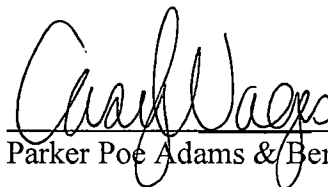
Zachery Arnold
460 Durham Rd.
Greer, SC 29650

Eric Rogers
10 Fort Dr.
Simpsonville, SC 29681

Tonya S. Turner
3494 Pinegate Trail
Snellville, GA 30039

LaTasha D. Terry
90 Preakness Dr.
Alpharetta, GA 30022

This the 26th day of February, 2016.



Parker Poe Adams & Bernstein LLP



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Associate
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Charleston, SC
Charlotte, NC
Columbia, SC
Raleigh, NC
Spartanburg, SC

February 26, 2016

RECEIVED

FEB 26 2016

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 the Reply Briefs for all parties in the above-referenced matter, along with a \$25 filing fee.

Sincerely,

A handwritten signature in black ink, appearing to read 'Fern A. Paterson', written over a horizontal line.

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
Wylie W. Clarkson, Esquire
Charles N. Griffin, III, Esquire
Jeffrey D. Wile, Esquire
Alan Wilson, South Carolina Attorney General
Trace M. Dillon, Esquire
Ahmad S. Washington, Esquire
Richard L. Jackson, Esquire

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Diane Greene
February 26, 2016
Page 2

Discover Bank (c/o CT Corporation System)
GE Commercial Finance Business Property (c/o CT Corporation System)
Jerome Smith
Ettie Pearl Booker
Wilford Daniels
Terrance Leslie, Jr.
Terrell Leslie, Sr.
Teaira Leslie
Patricia Terry
Sheila Terry
Johnny F. Cox
Terry Gilliam
Jerry Gilliam
Ira K. Carol
Demetrius J. Gilliam
Kehimonnie S. Gilliam
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