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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Judge

Appellate Case No.: 2015-000263

RECEIVED

APR 14 2016

SC Court of Appeals

Oak Pointe Homeowners' Association, Inc.,.....Respondent,

v.

Mackenzie E. Peffley,..... Appellant.

MOTION FOR EXTENSION TO SERVE AND FILE
APPELLANT'S INITIAL REPLY BRIEF AND ANY ACCOMPANYING
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

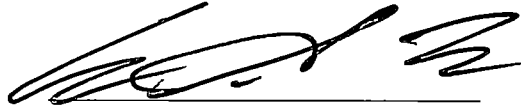
Andrew S. Radeker
S.C. Bar No. 73743
Harrison & Radeker, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant

Appellant hereby moves pursuant to Rule 263(b), SCACR, for a 14-day extension of the time in which to serve and file Appellant's Initial Reply Brief and any accompanying Designation of Matter to be Included in the Record on Appeal in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The deadline for service and filing of Appellant's Initial Reply Brief and any accompanying Designation of Matter to be Included in the Record on Appeal is tomorrow, April 14, 2016.
2. Appellant's undersigned counsel has depositions in Greenville today and tomorrow, oral argument in this court in another case on April 19, a mediation on April 22, and motion hearings scheduled for April 26 (including a motion of great significance).
3. Appellant's counsel believes there is good cause to grant the requested extension.
4. Respondent's counsel consents to an extension of this deadline, as noted in the email message attached.
5. Appellant requests that the court extend this deadline to April 28, 2016.

WHEREFORE Appellant prays for an Order extending the time in which to serve and file Appellant's Initial Reply Brief and any accompanying Designation of Matter to be Included in the Record on Appeal to April 28, 2016.

Respectfully submitted,



Andrew S. Radeker
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Attorney for Appellant

April 13, 2016

Drew Radeker

From: Drew Radeker
Sent: Tuesday, April 12, 2016 12:29 PM
To: Stephanie Trotter
Cc: Tammy Hicks
Subject: Re: Oak Pointe HOA v. Peffley

Thanks.

Drew Radeker

Sent from my iPhone - please excuse any typos

> On Apr 12, 2016, at 11:55 AM, Stephanie Trotter <Stephanie.Trotter@mccabetrotter.com> wrote:

>

> sure

>

> -----Original Message-----

> From: Drew Radeker [mailto:Drew@harrisonfirm.com]

> Sent: Tuesday, April 12, 2016 10:36 AM

> To: Stephanie Trotter

> Subject: Oak Pointe HOA v. Peffley

>

> Stephanie:

>

> Will you consent to an extension of our reply brief deadline?

>

> Thanks.

>

> Drew Radeker

>

> HARRISON & RADEKER, P.A.

> ATTORNEYS AT LAW

> Real Estate / Property Disputes · Foreclosure · Media Law · Zoning · Criminal Defense · Appeals Personal Injury · Consumer Law · Mediation/Arbitration · False Arrest · Commercial Litigation

>

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>

> This e-mail message contains confidential, privileged information intended solely for the addressee. Please do not read, copy or disseminate it unless you are the addressee. If you have received it in error, please call us (collect) at (803) 779-2211 and ask to speak with the message sender. Also, we would appreciate your forwarding the message back to us and deleting it from your system. Any tax information or written tax advice contained herein (including any attachments) is not intended to be and cannot be used by any taxpayer for the purpose of avoiding tax penalties that may be imposed on the taxpayer. (The foregoing legend has been affixed pursuant to U.S. Treasury Regulations governing tax practice.) Thank you.

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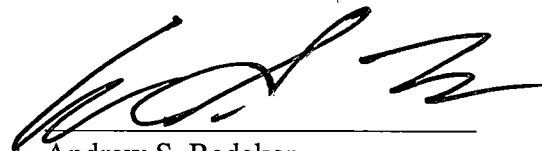
v.

Mackenzie E. Peffley,..... Appellant.

PROOF OF SERVICE

I certify that I served the foregoing motion for extension of time by depositing a copy of it on the date shown below in the United States Mail, postage prepaid, addressed as follows:

Stephanie C. Trotter, Esq.
Joel M. Deason, Esq.
McCabe Trotter & Beverly, PC
P.O. Box 212069
Columbia, SC 29221



Andrew S. Radeker
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Attorney for Appellant

April 13, 2016

LAW OFFICES
HARRISON & RADEKER, P.A.
923 CALHOUN STREET
COLUMBIA, SOUTH CAROLINA 29201

James C. Harrison, Jr.*
Andrew S. Radeker
Taylor M. Smith IV

* Mediator/Arbitrator

April 13, 2016

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APR 14 2016

SC Court of Appeals
P.O. Box 50143
Columbia, SC 29250

(803) 779-2211
(803) 779-6700 (FAX)

VIA HAND DELIVERY

The Hon. Jenny Abbott Kitchings
Clerk of Court, Court of Appeals of South Carolina
1220 Senate Street
Columbia, South Carolina 29201

Re: **Oak Pointe Homeowners' Assn., Inc. v. Mackenzie E. Peffley**
Appellate Case No.: 2015-000263

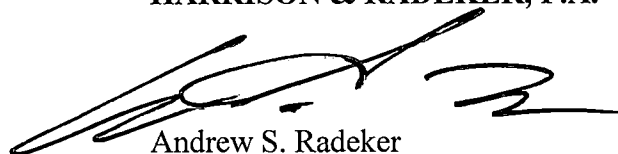
Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced case are an original and seven copies of a motion for extension of time, with attached proof of service thereof. Also enclosed is this firm's check in the amount of \$25.00 as the motion fee.

Kindly file these documents and return a file-stamped copy to this office in the stamped and addressed envelope enclosed. Of course, if you or your staff have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am,

Very truly yours,
HARRISON & RADEKER, P.A.



Andrew S. Radeker

ASR/

Enclosures

cc: Stephanie C. Trotter, Esq.
Joel M. Deason, Esq.