

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
In the Court of Common Pleas

Marvin H. Dukes, Presiding Judge

RECEIVED
AUG 19 2016
SC Court of Appeals

Case No. 2016-000767

JRC Properties, LLC.....Respondent,

v.

Dennis Corporation, a South Carolina Corporation,
and Daniel R. Dennis, IIIAppellants.

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

Pursuant to South Carolina Appellate Court Rule 263(b), Respondent hereby moves for an extension of thirty (30) days from the existing deadline to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal in this matter. Appellants filed their Initial Brief on July 26, 2016, though Appellant's counsel received the hard copy via regular mail on July 29. Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal is now due on or before August 25, 2016.

Respondent requests an extension of thirty (30) days to file the Initial Brief and Designation of Matter to be Included in the Record on Appeal on the following grounds: as the result of numerous hearings, depositions and meetings previously scheduled, Respondent's undersigned

counsel believes he will be unable to prepare the Initial Brief without additional time beyond the current deadline.

Respondent's Initial Brief and Designation of Matter to be Included in the Record of Appeal will be due on or before September 24, 2016 if the extension is granted.

Respectfully submitted,



Sean Michael Bolchoz
Bolchoz Law Firm, PA
6 Buckingham Plantation Drive, Suite B
Post Office Box 828
Bluffton, South Carolina 29910
(843) 836-3033
Attorney for Respondent

August 17, 2016

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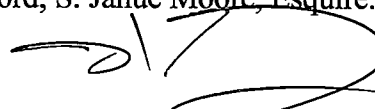
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PROOF OF SERVICE

I certify that I have served the Respondent's Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal upon the Appellant by depositing a copy of same in the United States Mail, postage prepaid, on August 17, 2016, addressed to Appellant's attorney of record, S. Jahue Moore, Esquire.



Sean Michael Bolchoz
Bolchoz Law Firm, PA
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Post Office Box 828
Bluffton, South Carolina 29910
(843) 836-3033
Attorney for Respondent

August 17, 2016

Other Counsel of Record:

S. Jahue Moore, Esquire

John C. Bradley, Jr., Esquire

Moore Taylor Law Firm, P.A.

P.O. Box 5709

West Columbia, South Carolina 29171

(803) 796-9160

Attorneys for Appellants

Z:\H to M Clients\McKim, Rollin - BL006\Appeal\proof of service - motion - extension of time .wpd



Sean Michael Bolchoz*
Attorney at Law
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SC Court of Appeals

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

**RE: JRC Properties, LLC v. Dennis Corporation, a South Carolina Corporation and Daniel R. Dennis, III
Appellate Case No. 2016-000767**

Dear Ms. Kitchings:

Please find enclosed the originals and one copy each of the Respondent's Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal and Proof of Service for same for the above-captioned case, along with this firm's check in the amount of \$25.00 for the filing fee. Please file the originals and return the clocked-copies to me via the enclosed self-addressed, stamped envelope.

By copy of this letter, we are serving counsel for Appellants with a copy of the motion.

With kind, personal regards, I am

Sincerely,

BOLCHOZ LAW FIRM, PA

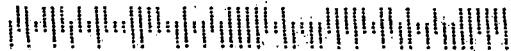
Katherine M. Boyd
SENDER'S E-MAIL ADDRESS:
ADMIN@BOLCHOZLAW.COM

/kmb

Enclosures

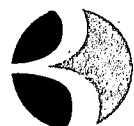
cc: S. Jahue Moore, Esquire (w/ enlc.)
Rollin McKim (via email only to remartantiques@aol.com)

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CHARLESTON SC 294

WED 17 AUG 2016 PM



**BOLCHOZ
LAW FIRM, PA**

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