

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Brian C. Duffy, Special Referee

Appellate Case No. 2016-001308
Trial Court Case No. 2015-CP-10-2616

RECEIVED

AUG 19 2016

SC Court of Appeals

Patricia Danyea Emory,

Respondent,

v.

Grace Hospitality, LLC, JHM Enterprises, Inc.,
and JHM Hotels, LLC d/b/a Charleston Marriott,

Appellants.

**MOTION FOR SECOND EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF OF APPELLANTS**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Duke R. Highfield (SC Bar No. 64224)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

Counsel for Appellants

Other Counsel of Record for Appellants:

Reynolds H. Blankenship, Jr.
WALKER REIBOLD
P.O. Box 61140
Columbia, SC 29260
(803) 454-0955

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Appellants Grace Hospitality, LLC, JHM Enterprises, Inc., and JHM Hotels, LLC d/b/a Charleston Marriott, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed July 20, 2016, the deadline for Appellants' initial brief and designation of matter is August 17, 2016. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 30 days (from August 17, 2016), i.e., through September 16, 2016. Respectfully, Appellants believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondents.

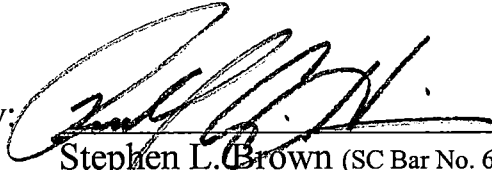
WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be September 16, 2016, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until

it acts upon this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Stephen L. Brown (SC Bar No. 66468)

Duke R. Highfield (SC Bar No. 64224)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

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Counsel for Appellants

Charleston, South Carolina

Dated: 8/17/16

Other Counsel of Record for Appellants:

Reynolds H. Blankenship, Jr.

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PROOF OF SERVICE

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Stephen L. Brown (SC Bar No. 66468)
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Counsel for Appellants

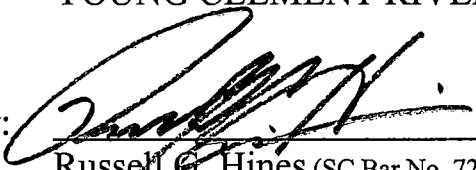
Other Counsel of Record for Appellants:

Reynolds H. Blankenship, Jr.
WALKER REIBOLD
P.O. Box 61140
Columbia, SC 29260
(803) 454-0955

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, do hereby certify that I have served the **MOTION FOR SECOND EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** on the above-named Respondent by depositing a copy of the same in the U.S. Mail, postage prepaid, on August 17, 2016, addressed as follows to counsel of record:

David B. Yarborough, Jr., Esquire
David Lail, Esquire
Yarborough Applegate, LLC
291 East Bay Street, Floor 2
Charleston, SC 29401
Counsel for Respondent

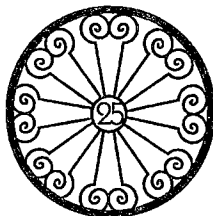
Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines (SC Bar No. 72100)
Counsel for Appellants

Charleston, South Carolina

Dated: 8/19/16



YCR LAW

Young Clement Rivers, LLP

CELEBRATING 50 YEARS OF LEGAL SERVICE

Russell G. Hines
Partner

50 YEARS

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August 17, 2016

VIA U.S. MAIL

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: Patricia Emory v. Grace Hospitality, LLC
Appellate Case No.: 2016-001308
Trial Court Case No.: 2015-CP-10-02616
Claim No.: 9620198087-001
Date of Loss: 5/6/2013
YCR File: 3646-20160398

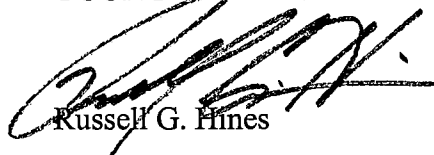
Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and seven (7) copies of a **Motion for Second Extension of Time to File/Serve Initial Brief of Appellants**. Also enclosed are the original and one (1) copy of a **Proof of Service** regarding the same and a check in the amount of \$25 to cover the cost of filing this motion. Kindly return one (1) court-stamped copy to me in the envelope provided.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines

RGH/amj
Enclosures

cc: David B. Yarborough, Jr., Esquire, Yarborough Applegate, LLC
David Lail, Esquire, Yarborough Applegate, LLC
Reynolds H. Blankenship, Jr., Esquire, Walker Reibold

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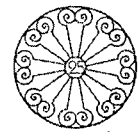
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