

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2013-CP-10-4450

RECEIVED
AUG 29 2016
SC Court of Appeals

LINDA A. GIBSON, *individually and in capacity*
as TRUSTEE OF THE PAUL WILLIAM GIBSON
FAMILY TRUST; HERITAGE SEVEN, LLC;
SEVEN OAKS APARTMENTS, LLC; and 3205
PALM BOULEVARD, LLC., Appellants,

v.

ANDREW K. EPTING, JR., LLC; ANDREW K.
EPTING, JR.; GEORGE J. KEFALOS, P.A.;
GEORGE J. KEFALOS; GEDNEY M. HOWE, III,
P.A.; GEDNEY M. HOWE, III; JOHN S. WEST,
ATTORNEY-AT-LAW, LLC; and JOHN S. WEST, Respondents.

**APPELLANTS' MOTION FOR EXTENSION OF
TIME TO FILE BRIEF OF APPELLANTS, REPLY BRIEF OF APPELLANTS AND
RECORD ON APPEAL**

Pursuant to Rule 240, SCACR, Appellants, Linda A. Gibson, *et al.*, through their undersigned counsel, hereby move this Honorable Court for an extension of time for thirty (30) additional days from the existing September 6, 2016 due date, until October 6, 2016, to file and serve their Brief of Appellants, Reply Brief of Appellants, and the Record on Appeal.

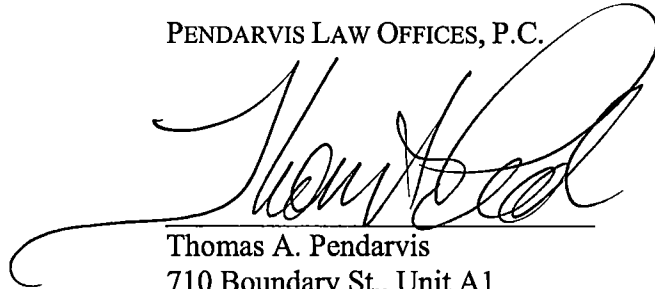
The grounds for this motion are in consideration of the substantial size of the Record on Appeal, and the limited time available to counsel for Appellants due to other professional obligations.

CONCLUSION

Counsel respectfully requests this thirty (30) day extension until October 6, 2016, to allow time to properly prepare and file their Brief of Appellants, Reply Brief of Appellants and the Record on Appeal.

Respectfully submitted,

PENDARVIS LAW OFFICES, P.C.



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James R. Davis, Esq.
J. DAVIS LAW FIRM, P.C.
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234 Seven Farms Drive, Suite 211B
Daniel Island, South Carolina 29492
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Counsel for Appellants

Beaufort, South Carolina

August 26, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2016-000432

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AUG 29 2016

SC Court of Appeals

Linda A. Gibson, individually and in capacity as
Trustee of the PAUL WILLIAM GIBSON FAMILY TRUST;
HERITAGE SEVEN, LLC; SEVEN OAKS APARTMENTS, LLC;
and 3205 PALM BOULEVARD, LLC, Appellants,

vs.

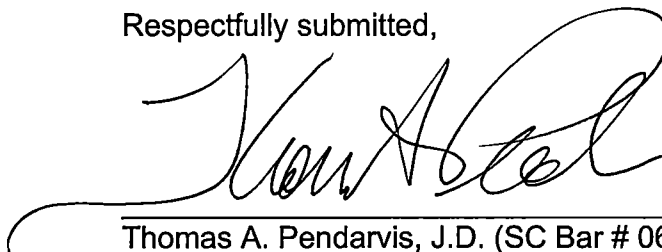
ANDREW K. EPTING, JR., LLC; Andrew K. Epting, Jr.;
GEORGE J. KEFALOS, P.A.; George J. Kefalos;
GEDNEY M. HOWE, III, P.A.; Gedney M. Howe, III;
JOHN S. WEST, ATTORNEY-AT-LAW, LLC; and John S. West, Respondents.

PROOF OF SERVICE

I, Thomas A. Pendarvis, a lawyer with PENDARVIS LAW OFFICES, P.C., certify that I have served one (1) copy of the MOTION FOR EXTENSION OF TIME TO FILE BRIEF OF APPELLANTS, REPLY BRIEF OF APPELLANTS AND RECORD ON APPEAL on counsel for Respondents, M. Dawes Cooke, Jr. J.D. and Jeremy E. Bowers, J.D., by depositing a copy of the same in the United States Mail, postage prepaid, on the 26th day of August, 2016, addressed as follows:

M. Dawes Cooke, Jr. J.D.
Jeremy E. Bowers, J.D.
BARNWELL WHALEY PATTERSON & HELMS, LLC
288 Meeting Street, Suite 200
Charleston, SC 29401

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tom A. Pendarvis', with a long horizontal flourish extending to the left.

Thomas A. Pendarvis, J.D. (SC Bar # 064918)
PENDARVIS LAW OFFICES, P.C.
710 Boundary St., Unit A1
Beaufort, SC 29902-4188

Counsel for Appellants

August 26, 2016

PENDARVIS LAW OFFICES, PC



August 26, 2016

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SC Court of Appeals

VIA US MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Attention: V. Claire Allen
Post Office Box 11629
Columbia, South Carolina 29211

**Re: Linda A. Gibson, et. al., v. Andrew K. Epting, Jr., et.al.
Appellate Case No. 2016-000432**

**APPELLANTS' FIRST REQUEST FOR EXTENSION OF TIME
TO FILE THE FINAL BRIEF OF APPELLANTS, FINAL REPLY BRIEF OF
APPELLANTS, AND RECORD ON APPEAL**

Dear Ms. Kitchings and Ms. Allen:

Please allow this correspondence to serve as Appellants' request to enlarge the time for Appellants to file the Brief of Appellants, Reply Brief of Appellants and the Record on Appeal with the Court of the Appeals in the above referenced matter.

Enclosed please find an original and six copies of Appellants' MOTION FOR EXTENSION OF TIME TO FILE BRIEF OF APPELLANTS, REPLY BRIEF OF APPELLANTS AND RECORD ON APPEAL, along with PROOF OF SERVICE and a check in the amount of Twenty-Five Dollars (\$25.00) to serve as the filing fee for this request. Kindly file the original, and five copies, and return one clocked copy in the enclosed postage prepaid, self addressed envelope.

If you have any questions or would like to discuss this, please feel free to call or e-mail me.

Thank you in advance for your attention to this matter.

THOMAS A. PENDARVIS, J.D.
Admitted in SC and GA
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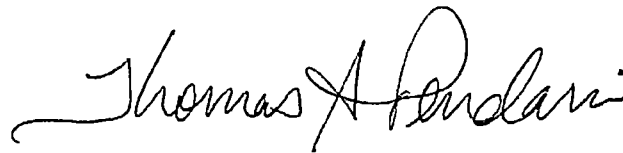
✓

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Page 2
August 26, 2016

With kind regards, I remain

Sincerely,

PENDARVIS LAW OFFICES, P.C.



Thomas A. Pendarvis

TAP/sew
Enclosures

cc w/encls: M. Dawes Cooke, J.D.
Jeremy E. Bowers, J.D.
ec w/encls: James R. Davis, J.D.
Linda A. Gibson

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