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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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OCT 27 2016

SC Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Gordon G. Cooper, Master-in-Equity

Case No. 2015-CP-42-04448  
Appellate Case No. 2016-001764

Peach REO, LLC, a Delaware limited liability company, Respondent,

v.

Blalock Investments, LLC; Todd Smith; Debra Masuga; Subway Real Estate, LLC; and County of Spartanburg, a political subdivision of the State of South Carolina, Defendants,

Of Whom Blalock Investments, LLC; Todd Smith; and Debra Masuga are the Appellants.

And

Blalock Investments, LLC; Todd Smith; and Debra Masuga, Third Party Plaintiffs, v. Capital Crossing Servicing Company, LLC, Respondent.


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

Pursuant to Rules 240 and 263, SCACR, the Appellants, Blalock Investments, LLC, Todd Smith, and Debra Masuga, respectfully move for an extension of thirty (30) days to file the Appellants' initial brief and designation of matter to be included in the record on appeal. Counsel for Appellants received the transcript on September 28, 2016. Thus, the deadline for serving and filing Appellants' initial brief and designation of matter to be included in the record on appeal is Friday, October 28, 2016.



If the Court should grant the Appellants' request for an extension of time, the new deadline for the applicable filings would be Monday, November 28, 2016. Counsel for the Appellants has consulted with counsel for the Appellees who advised that he does not object to the granting of the thirty (30) day extension. This requested extension is not intended to hinder, delay, or prejudice the judicial proceedings.

October 24, 2016



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Adam C. Bach (SC Bar # 74885)  
R. Hudson Smith (SC Bar # 101369)  
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Attorneys for Appellants

Other Counsel of Record:  
Frank B. B. Knowlton

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Blalock Investments, LLC; Todd Smith; and Debra Masuga, Third Party Plaintiffs, v. Capital  
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**PROOF OF SERVICE**

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I certify that I have served the Motion for Extension of Time to File Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal on the Respondents, Peach REO, LLC and Capital Crossing Servicing Company, LLC, by depositing a copy of same in the United States Mail, postage prepaid, on October 24, 2016, addressed to their attorneys of record as follows:

Frank B. B. Knowlton  
Nelson Mullins Riley & Scarborough LLP  
1320 Main Street, 17th Floor  
P.O. Box 11070 (29211-1070)  
Columbia, SC 29201

October 24, 2016



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† Of counsel

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

*Re: Peach REO, LLC, a Delaware limited liability company vs. Blalock Investments, LLC; Todd Smith; Debra Masuga; Subway Real Estate, LLC and County of Spartanburg, a political subdivision of the State of South Carolina, et al  
C. A. No. 2015-CP-42-04448  
Appellate Case No.: 2016-001764*

Dear Ms. Kitchings:

Enclosed please find the original and one copy (1) of appellants' motion for extension of time to file initial brief and designation of matter to be included in the record on appeal, along with our firm's check in the amount of \$25.00 for your filing fee and a proof of service for the same. We would appreciate your filing the original and returning a clocked copy to us.

Please let us know if we may provide any additional information to you at this time.

Sincerely,

ELLER TONNSEN BACH, LLC

*for*

Adam C. Bach  
abach@etblawfirm.com

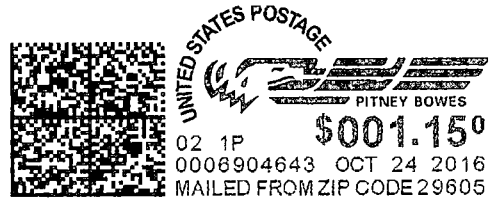
ACB/amp  
Enclosures

cc: Attorneys for Respondents:  
Frank B. B. Knowlton



ELLER TONNSEN BACH  
*Attorneys at Law*

1306 South Church Street • Greenville, SC 29605



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