

8/6/11

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

**RECEIVED**

Brian C. Duffy, Esquire, Special Referee

NOV 17 2016

**SC Court of Appeals**

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

Patricia Danyeal Emory, Respondent,

v.

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

RESPONDENT'S MOTION FOR EXTENSION

Respondent, Patricia Danyeal Emory, by and through the undersigned counsel, hereby requests a 30-day extension to file and serve Respondent's Initial Brief and Designation of Matter. With the extension, the brief will be due on December 16, 2016.



David B. Yarborough, Jr.  
David B. Lail  
YARBOROUGH APPEL GATE LLC  
291 East Bay Street, Floor 2  
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Phone: 843-972-0150  
Fax: 843-277-6691  
*Attorneys for Respondent*

11-15, 2016  
Charleston, South Carolina

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and JHM Hotels, LLC d/b/a Charleston Marriott, Appellants.

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PROOF OF SERVICE

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I certify that I have served Respondent's Motion for Extension on counsel of record by depositing a copy of it in the United States Mail, postage prepaid, on November 15, 2016, addressed as follows:

Stephen L. Brown, Esquire  
Duke R. Highfield, Esquire  
Russell G. Hines, Esquire  
Young Clement Rivers, LLP  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401

Reynolds H. Blankenship, Jr., Esquire  
RHB Law Firm, LLC  
171 Church Street, Suite 340  
Charleston, South Carolina 29401



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Charleston, South Carolina

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**SC Court of Appeals**



**YARBOROUGH  
APPLEGATE**  
ATTORNEYS AT LAW

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Licensed in SC and DC

November 15, 2016

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**SC Court of Appeals**

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

Re: Patricia Danyea Emory v. Grace Hospitality, LLC, JHM Enterprises, Inc., and  
JHM Hotels, LLC d/b/a Charleston Marriott  
Appellate Case No. 2016-001308  
Our File No. 13-028

Dear Ms. Kitchings:

Enclosed please find a motion requesting a 30-day extension to file and serve Respondent's Initial Brief and Designation of Matter, as well as the \$25.00 motion fee. This motion is made in light of work-related and other time commitments. Also, Appellants have no objection to this request.

With this extension, Respondent's Initial Brief and Designation of Matter will be due on December 16, 2016. Thank you for your consideration. As I am,

Sincerely,

David B. Lail

DBL:lnr

Enclosures

cc: Stephen L. Brown, Esquire  
Duke R. Highfield, Esquire  
Russell G. Hines, Esquire  
Reynolds H. Blankenship, Esquire

✓



**YARBOROUGH  
APPLGATE**

ATTORNEYS AT LAW

291 East Bay Street / Floor 2  
Charleston, South Carolina 29401

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The Honorable Jenny Abbott Kitchings  
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