

December 29, 2016

Adam Horner
Email: ahorner@lawhssm.com
704-227-1041

VIA FACSIMILE AND FEDERAL EXPRESS

Jenny Abbott Kitchings
Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201
(803) 734-1890

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SC Court of Appeals

Re: Request for Extension of Time to File Initial Brief of Appellants in Case No. 2016-002059

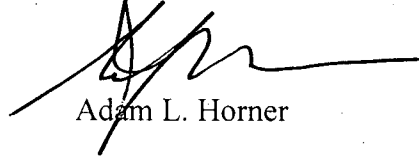
Dear Ms. Kitchings:

This firm has concurrently submitted a Notice of Appearance to serve as additional counsel for Appellants Janet Shander-Horning and Jeff Horning (the "Hornings") in connection with the above-captioned appeal (the "Appeal"). The Hornings present counsel of record in the Appeal, Mr. D. Randolph Whitt, was provided to the Hornings and paid for through their title insurance, Old Republic policy number EHP104412. The Hornings have recently reached a settlement with Old Republic that is in the process of being reduced to writing. As part of the settlement, Old Republic will no longer pay for and provide the Hornings with counsel in the Appeal. As such, the Hornings have sought replacement counsel and have hired my firm to represent them. Mr. Whitt will seek to withdraw shortly.

The current deadline for the Appellants to file their initial brief in the Appeal is January 6, 2017. We are in the process of obtaining the file on the case from Mr. Whitt and getting up to speed so that he can begin the withdrawal process and we can adequately represent the Hornings going forward. The Appellants hereby respectfully request a thirty (30) day extension of time to file their initial brief in the Appeal through and including February 4, 2017. Counsel of record for Respondents and Mr. Whitt are also receiving a copy of this request. We attempted to contact Mr. Wright, counsel for Respondents, prior to submitting this request. We left a message at his office on December 29, 2016, however we have not as of the time of this letter received a return call. Due to the immediacy of the filing deadline, we submitted this request without having received a response from Mr. Wright, but as set forth above, he is copied on our request for an extension. We do not believe that an extension of time for Appellant to file their brief will prejudice Respondents in any way.

We look forward to speaking to you soon about this matter. Please let us know if you require any additional information from Appellants or the undersigned counsel.

Sincerely,



Adam L. Horner

Cc (by Federal Express):

Phillip E. Wright
408 North Main Street
Lancaster, South Carolina 29720
(803) 286-4343
Attorney for Respondents

D. Randolph Whitt
Fleming & Whitt, P.A.
344 Blossom View Court
West Columbia, South Carolina 29170
Attorney for Appellants

Jeff Horning
Janet Shander-Horning
(by email only)

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HAMILTON STEPHENS STEELE + MARTIN
201 S. COLLEGE STR. STE. 2020
CHARLOTTE, NC 28244
UNITED STATES US

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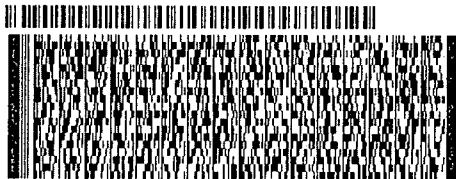
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