

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

Appeal No. 2016-001948
Case No. 2013-CP-07-1807

William Loflin and Leslie Loflin,

Appellants,

v.

BMP Development LP, Balsam Mountain
Group, LLC, Coward, Hicks & Siler, P.A.,
J.K. Coward, Jr., Chicago Title Insurance
Company, and Counsellor Title Agency,
Inc.,

Defendants,

OF WHICH

Coward, Hicks & Siler, P.A. and
J.K. Coward, Jr.,

Respondents.

RECEIVED

JAN 26 2017

SC Court of Appeals

MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF OF APPELLANTS

Appellants, by and through their undersigned counsel, hereby move the Court for an extension of time within which to file their Initial Brief of Appellants. In support of this

Motion, Appellants would show this Court as follows:

1. Appellants' Initial Brief is now due on January 30, 2017.
2. Appellants' counsel has three briefs due in this Court on January 30, 2017:
 - a. As a result of the Respondent obtaining a consent to file its Initial Brief, Appellants' counsel has a Reply Brief due in another appeal [Appeal No. 2016-1840 ("Chicago Appeal")];
 - b. Appellants' counsel has another Initial Brief of Appellant due in a second appeal [Appeal No. 2016-1928 ("Counsellor Appeal")]; and
 - c. Appellants' counsel has its Initial Brief of Appellant due in this appeal [Appeal No. 2016-1948 ("Coward Appeal")].
3. Appellants' counsel already has filed two appellate briefs this month, one in Delaware and one in the United States Court of Appeals for the Fourth Circuit last week.
4. Appellants filed yesterday a Motion seeking a brief extension to file their Reply Brief in the Chicago Appeal until February 15, 2017, because, among other reasons, the service by mail of Respondent's brief in that appeal provided Appellants only four days to respond.
5. In a separate Motion filed this date, Appellants are requesting that they be permitted to sequence the filing of their Initial Brief in the Counsellor Appeal until thirty days after filing their Reply Brief in the Chicago Appeal.
6. By this Motion, Appellants are requesting that they be permitted to sequence the filing of their Initial Brief in this appeal (the Coward Appeal) until thirty days after filing

their Initial Brief in the Counsellor Appeal.

7. Respondent's counsel has consented to this Motion.

Wherefore, Appellants respectfully request that they be granted an extension within which to file their Initial Brief in this matter until thirty days after filing their Initial Brief in the Counsellor Appeal.

Daniel A. Speights (SC Bar # 5027)
A.G. Solomons, III (SC Bar # 68291)
SPEIGHTS & RUNYAN
100 Oak Street, East
Post Office Box 685
Hampton, South Carolina 29924
(803)943-4444 (telephone)
(803)943-4599 (fascimile)

By: Daniel A. Speights
Attorneys for Appellants

Hampton, South Carolina

January 25, 2017

SPEIGHTS & RUNYAN

ATTORNEYS AT LAW
100 OAK STREET, EAST
POST OFFICE BOX 685
HAMPTON, SOUTH CAROLINA 29924
(803) 943-4444

DANIEL A. SPEIGHTS
dspeights@speightsrunyan.com

TELECOPIER
(803) 943-4599

January 25, 2017

VIA UPS NEXT DAY AIR

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: William Loflin v. BMP Development, LP (3)
Appellate Case No. 2016-001948

Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced matter is Motion for Extension of Time to File Initial Brief of Appellants together with a check in the amount of \$25.00 for the filing fee.

Please accept my kind regards.

Sincerely yours,



Daniel A. Speights

DAS/rb
Enclosures
cc: David W. Overstreet, Esquire
Michael B. McCall, Esquire

RECEIVED

JAN 26 2017

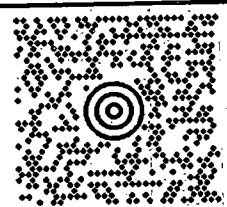
SC Court of Appeals

Apply sh
not us
S Gro
S Stai
S 3 D
S Wor

DANIEL A. SPEIGHTS
803-943-4444 200
SPEIGHTS & RUNYAN
100 OAK STREET EAST
HAMPTON SC 29924

0.0 LBS LTR 1 OF 1

SHIP TO:
CLERK, SC COURT OF APPEALS
8037341890
HONORABLE JENNY ABBOTT KITCHINGS
1220 SENATE STREET
COLUMBIA SC 29201-3769



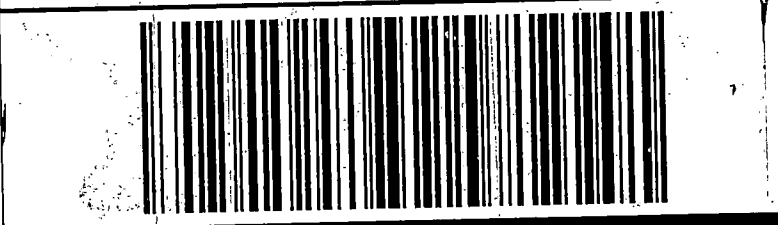
SC 292 9-01



UPS NEXT DAY AIR

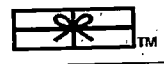
1

TRACKING #: 1Z 1X3 F44 01 9703 5344



BILLING: P/P

UIS 19.1.09. MACNV50 84.0A 01/2017



UPS Internet Shipping: Shipment Label

<https://www.ups.com/uis/create?ActionOriginPair=default> Pr...

600-742-5877 or visit usps.com

There is no weight limit for envelopes

urgent
service is
those li
applicat
the UP
to com
pages
service
for UPS
and or n
ht.
ivalence

elop
e.