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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHESTER COUNTY  
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Appellate Case No. 2016-001104

RECEIVED  
MAR 01 2017  
SC Court of Appeals

Heather Rousey Piper,

Respondent,

v.

Kerry Grissinger,  
William P. Hardee, and  
Paul E. Lesondak,

of whom:  
Kerry Grissinger and  
Paul E. Lesondak,  
are the

Appellants.

MOTION FOR EXTENSION OF TIME

Pursuant to Rules 240 and 263(b), S.C.A.C.R., the Appellants, by their counsel herein, move this Court for an order granting them an extension of time as to their Initial Brief and Designation of Matter to be included in the Record on Appeal, on the grounds stated below:

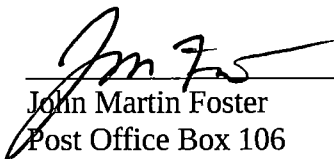
1. The Respondent's Brief was served by mailing of February 16<sup>th</sup>, 2017. Under the Rule 208(a)(3), S.C.A.C.R., the Appellants' Initial Reply Brief is due as of February 28<sup>th</sup>, 2017.
2. Counsel for Appellants has been prevented from completing the said Initial Reply Brief by reason of Court appearances and the press of business in his office.
3. To this end, counsel for Appellants request an extension of time for a period of twenty (20) days, in which to complete that item.



The basis of this Motion is the within-cited Rules, the records of this appeal, and any attached affidavit or stipulation of the undersigned, which items are hereby incorporated in this Motion.

WHEREFORE, the Appellants herein move this Court to be allowed an extension of time to file their Initial Reply Brief, as set out above, pursuant to Rule 240 and 263(b), S.C.A.C.R.

February 27, 2017

  
\_\_\_\_\_  
John Martin Foster  
Post Office Box 106  
Rock Hill, South Carolina 29731  
803 324-8100  
Attorney for Appellants

Other Counsel of Record:

cc: Jessica C. Crowson  
Rogers Lewis  
Post Office Box 11803  
Columbia, S. C. 29211  
Attorneys for Respondent  
(803) 256-1268

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of whom:  
Kerry Grissinger and  
Paul E. Lesondak,  
are the

Appellants.


PROOF OF SERVICE

I certify that I have served the Motion for Extension dated February 27, 2017, on the following counsel or persons of record:

Jessica C. Crowson  
Rogers Lewis  
Post Office Box 11803  
Columbia, S. C. 29211  
Attorneys for Respondent

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out above, pursuant to Rule 262, S.C.A.C.R.

February 27, 2017

  
\_\_\_\_\_  
John Martin Foster  
Post Office Box 106  
Rock Hill, S. C. 29731-6106  
803 324-8100  
Attorney for Appellants

**JOHN MARTIN FOSTER**

*Attorney at law*

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223 East Main Street Suite 520	Rock Hill SC	803 324 8109 Fax
Rock Hill South Carolina 29730	29731-6106	jmfoster@comporium.net

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February 27, 2017

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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MAR 01 2017

SC Court of Appeals

Re: Heather Rousey Piper, Respondent  
v. Kerry Grissinger, William P. Hardee, and Paul E. Lesondak,  
of whom Kerry Grissinger and Paul E. Lesondak are the Appellants  
Appellate Case No.: 2016-001104

Dear Ms. Kitchings:

In accordance with Rules 240 and 263(a), S.C.A.C.R., enclosed herewith please find the original and seven (7) copies of the Appellant's Motion for Extension, together with the Certificate of Service for the same in the above referenced case. I also enclose our check for the Motion fee of \$25.00.

By copy of this letter, I am serving the attorney for the Respondents with copies of the said Motion, as evidenced by the Certificate of Service.

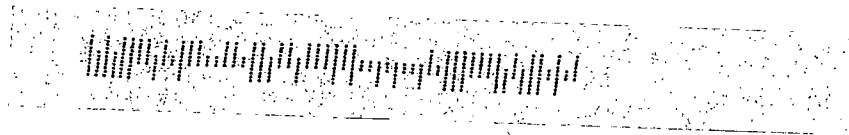
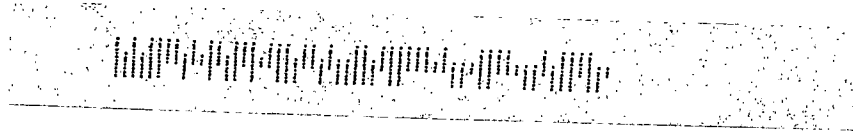
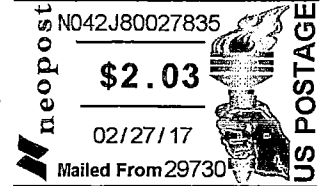
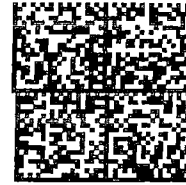
Please return the extra conformed copy to my office in the enclosed self-addressed, stamped envelope. As always, thank you, and your staff, for your assistance in these matters.

Sincerely yours,

  
John Martin Foster

jmf/  
enclosures

cc: Jessica C. Crowson  
Rogers Lewis  
Post Office Box 11803  
Columbia, S. C. 29211  
Attorneys for Respondent  
(803) 256-1268



**John Martin Foster Attorney**

223 East Main St Suite 520  
Post Office Box 106  
Rock Hill SC 29731-6106

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**TO:**

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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