

**IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

The Honorable Kristi Lea Harrington, Circuit Court Judge

Case No. 2013-CP-08-00179
Appellate Case No. 2017-000202

Ex Parte:

Nationwide Mutual Fire Insurance Company.....Appellant,

In Re:

Beresford Commons Homeowners Association, Inc.....Respondent,

v.

Superior Solution, LLC.....Respondent.

**RESPONDENT’S MOTION FOR EXTENSION OF TIME TO SERVE INITIAL BRIEF
AND DESIGNATION OF MATTER**

COMES NOW the Respondent, Beresford Commons Homeowners Association, Inc., by and through their undersigned attorneys, and hereby request a thirty (30) day extension of time to serve and file their Initial Brief and Designation of Matter upon the Appellant, respectfully showing as follows:

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1. By letter to the Court dated June 14, 2017, Respondent requested an initial thirty (30) day extension to file their Initial Brief and Designation of matter, which was their first request. This Court granted Respondent's request by an Order dated June 20, 2017.

2. The present due date for Respondent's Initial Brief and Designation of Matter is July 24, 2017. Respondent requests a thirty (30) day extension to that deadline in order to complete their review of the record and develop their Initial Brief, which efforts have been slowed due to scheduling commitments in unrelated actions as well as travel and family commitments.

3. The undersigned counsel has conferred with all counsel of record prior to filing this motion and have consented to this request.

WHEREFORE Respondent respectfully requests that this Court issue an Order granting a thirty (30) day extension of time to file their Initial Brief and Designation of Matter.

Respectfully submitted this 14th day of July, 2017.

SEGULLAW FIRM, PC

By: 

Phillip W. Segui, Jr.

Amanda M. Blundy

864 Lowcountry Blvd., Suite A

Mt. Pleasant, SC 29464

(843) 884-1865

Email: psegui@seguilawfirm.com

ablundy@seguilawfirm.com

and

THE CHAKERIS LAW FIRM
John T. Chakeris
231 Calhoun Street
Charleston, SC 29401
(843) 853-5678
Email: john@chakerislawfirm.com

*Attorneys for Respondent Beresford
Commons Homeowners Association, Inc.*

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PROOF OF SERVICE

I certify that I have, on the date indicated below, served Respondent's Motion for Extension of Time to Serve Initial Brief and Designation of Matter by electronic mail and mailing a copy of same via United States Mail, to counsel of record, at the following addresses:

J.R. Murphy, Esquire
Adam J. Neil, Esquire
Timothy J. Newton, Esquire
P.O. Box 6648
Columbia, SC 29260
jmurphy@murphygrantland.com
aneil@murphygrantland.com
tnewton@murphygrantland.com
Attorneys for Plaintiff Nationwide Mutual Fire Insurance Company

Albert A. Lacour, III, Esquire
Clawson & Staubes, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492
alacour@clawsonandstaubes.com
Attorney for Superior Solution, LLC

This 14th day of July, 2017.


Josephine Lyons

SEGUI LAW FIRM PC

864 Lowcountry Boulevard
Suite A
Mount Pleasant, SC 29464

T 843-884-1865

Amanda M. Blundy
ablundy@seguilawfirm.com

July 14, 2017

Via Overnight Delivery

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

RE: Beresford Commons Homeowners Association, Inc. v. Portrait Homes-South Carolina, LLC, et al.
Civil Action Case No.: 2013-CP-08-179
Appellate Case No.: 2017-000202

Dear Ms. Kitchings:


Enclosed for filing please find an original and six (6) copies of Respondent, Beresford Commons Homeowners Association, Inc.'s Motion for an Extension of Time to File and Serve Their Initial Brief and Designation of Matter, as well as this firm's check in the amount of \$25.00 in satisfaction of the filing fee.

I would appreciate your filing these papers with the Court and returning a file-stamped copy thereof to my office in the self-addressed, stamped envelope provided for your convenience.

Your assistance with this matter is greatly appreciated.

With best regards, I am

Very truly yours,


Amanda M. Blundy

AMB/jl

Enclosures

cc: John T. Chakeris, Esquire - via electronic mail
J.R. Murphy, Esquire - via U.S. mail and electronic mail
Adam J. Neil, Esquire - via U.S. mail and electronic mail
Timothy J. Newton, Esquire - via U.S. mail and electronic mail
Albert A. Lacour, III, Esquire - via electronic mail

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ORIGIN ID:RBWA (843) 884-1865
AMANDA M. BLUNDY

864 LOWCOUNTRY BLVD.
SUITE A
MT. PLEASANT, SC 29464
UNITED STATES US

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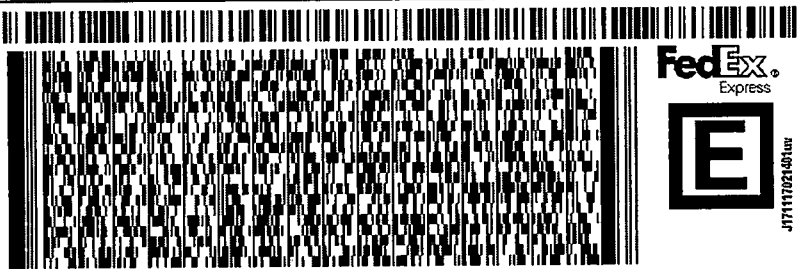
TO THE HON. JENNY ABBOTT KITCHINGS
CLERK OF COURT
SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET
COLUMBIA SC 29201

546J1/CO/02/63C1

(803) 734-1890
INV.
PO:

REF: BERESFORD - APPEAL

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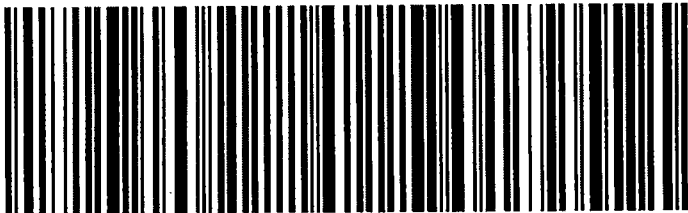


MON - 17 JUL 3:00P
STANDARD OVERNIGHT

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