

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM MARION COUNTY  
Court of Common Pleas

W. Haigh Porter, Special Referee

Case No. 2011-CP-33-00016

RECEIVED

NOV 19 2012

SC Court of Appeals

Wells Fargo Bank, N.A., successor-in-interest  
to Wachovia Bank, National Association,

v.

Plaintiff

Marion Amphitheatre, LLC, David P. Gannon,  
Michael Guarco, Carolina Entertainment Complex, LLC  
and 4 Prophets, LLC a/k/a 4 Profits, LLC,

Defendants,

Of Whom,  
David P. Gannon and Michael Guarco are the,

Appellants,

And  
4 Prophets, LLC, a/k/a 4 Profits, LLC is the,

Respondent.

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**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO  
FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

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The Respondent 4 Prophets, LLC moves the Court, pursuant to Rule 240 SCAR, for an Order extending the time for filing its Initial Brief and Designation of Matter in the above referenced matter for a period of thirty (30) days. This Motion is based upon Rule 240 SCAR and is made on the grounds that Respondent's counsel has been unexpectedly called away from his office and will not be able to complete the preparation of the said documents within the time currently allotted.

RESPECTFULLY SUBMITTED,



November 15, 2012

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John P. Williams, Jr. #06153  
PO Box 883  
Marion, SC 29571  
(843) 423-7630 - Tel.  
(843) 407-3672 - Fax  
Email: [jpwlawoffice@att.net](mailto:jpwlawoffice@att.net)  
Attorney for Respondent

**Other Counsel of Record:**  
E. Lloyd Willcox, II  
PO Box 1909  
Florence, SC 29503-1909  
Attorney for Appellants

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Of Whom,  
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Respondent.

PROOF OF SERVICE

I certify that I have served the Respondent's Motion for Extension of Time on the Appellants, through their attorney of record, by depositing a copy of same in the United States Mail, postage prepaid, to

E. Lloyd Willcox, II  
PO Box 1909  
Florence, SC 29503-1909  
Attorney for Appellants

John P. Williams, Jr. #06153  
John P. Williams, Jr., PA  
PO Box 883  
Marion, SC 29571  
(843) 423-7630 - Tel. (843) 407-3672 - Fax  
Attorney for Respondent

November 15, 2012

**JOHN P. WILLIAMS, JR., P.A.**

**ATTORNEY AT LAW**  
300 NORTH MAIN STREET  
POST OFFICE BOX 883

JOHN P. WILLIAMS, JR.

**MARION, SOUTH CAROLINA 29571**

TELEPHONE (843) 423-7630  
FACSIMILE (843) 407-3672

November 15, 2012

HONORABLE JENNY ABBOTT KITCHINGS  
CLERK OF COURT  
SC COURT OF APPEALS  
PO BOX 11629  
COLUMBIA, SC 29211

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NOV 19 2012

**SC Court of Appeals**

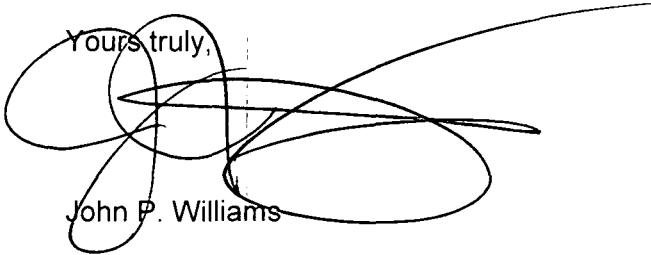
RE: Wells Fargo v Marion Amphitheatre, LLC Guarco. et al  
Civil Case No. : 2011-CP-33-00016  
Case Tracking No. 2012-211806

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Respondent's Motion for Extension of Time to File Initial Brief and Designation Of Matter. I am also enclosing a Proof of Service and my check in the amount of \$25.00 for the filing fee.

With kind regards, I remain

Yours truly,

  
John P. Williams

cc: w/enclosure E. Lloyd Wilcox