

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Joseph M. Strickland, Master-in-Equity

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SEP 14 2017

Case No.: 2014-CP-40-1805

SC Court of Appeals

Country Properties, LLC.....Respondent,

vs.

Nancy Dunn Martin.....Appellant.

APPELLANT'S MOTION FOR AN EXTENSION OF TIME TO FILE  
APPELLANT'S INTIAL BRIEF

Pursuant to Rules 240(e) and 263(b) of the South Carolina Appellate Court Rules, Appellant, Nancy Dunn Martin ("Appellant" or "Martin"), hereby moves for an Order of this Court granting a thirty-day extension to file Appellant's Initial Brief. Appellant's Notice of Appeal was filed on August 22, 2017. Therefore, Appellant's Initial Brief is currently due on September 22, 2017. Appellant respectfully requests a thirty-day extension thereby making Appellant's Initial Brief due on October 23, 2017.

A thirty-day extension is requested to ensure that Appellant has adequate time to fully address and brief the issues on appeal. An extension will also provide this Court with time to issue a ruling on Appellant's Request for Leave to Make Motion for Relief Pursuant to Rule 60(b) prior to the time that Appellant's Initial Brief is due. Finally, an extension will have no prejudicial effect on Respondent. Respondent has consented to Appellant's request for a thirty-day extension.



**BRUNER, POWELL, WALL & MULLINS, LLC**



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*Attorneys for Appellant*

Columbia, South Carolina

September 14, 2017

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PROOF OF SERVICE

I certify that I have served *Appellant's Motion for an Extension of Time to File Appellant's Initial Brief* on Respondent Country Properties, LLC by depositing a copy of it in the United States Mail, postage prepaid, on September 14, 2017, addressed to its attorneys of record, John Wells, Esq. and M. Brent McDonald, Esq. (addresses shown below).

September 14, 2017

  
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\*\* Also Admitted in District of Columbia

September 14, 2017

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court -The South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

**RE: Country Properties, LLC v. Nancy Dunn Martin  
Civil Action No.: 2014-CP-40-1805  
BPWM File No.: 8-2376.102**

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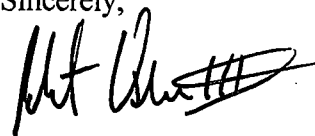
SEP 14 2017  
SC Court of Appeals

Dear Ms. Kitchings:

Enclosed herewith you will find an original and eight (8) copies of *Appellant's Motion for an Extension of Time to File Appellant's Initial Brief* along with a \$25.00 check to cover the applicable filing fee. Also enclosed is a Proof of Service evidencing service of the same upon counsel for the Respondent. I kindly ask that your staff file the original and copies in accordance with your procedures. Thereafter, I ask that your staff return two (2) filed copies back to my runner who will be waiting. Feel free to call me if you, or a member of your staff, have any questions.

With my kindest regards, I am

Sincerely,



Robert C. Osborne III

/RCO

Enclosures

cc: John Wells, Esquire (Via U.S. Mail w/ Copy of Enclosures)  
M. Brent McDonald (Via U.S. Mail w/ Copy of Enclosures)  
Nancy D. Martin (Via E-Mail Only w/ Copy of Enclosures)