

THE STATE OF SOUTH CAROLINA
IN THE SOUTH CAROLINA COURT OF APPEALS

APPEAL FROM HORRY COUNTY
COURT OF COMMON PLEAS

Karl A. Folkens, Special Referee

Appellate Case No.: 2017-001646

RECEIVED
FEB 14 2018
SC Court of Appeals

Jericho State Capital Corp. of Florida.....Plaintiff,

v.

Chicago Title Insurance Company.....Defendant,

AND

Lynx Jericho Partners, LLC.....Plaintiff,

v.

Chicago Title Insurance Company.....Defendant.

scc

Of whom Jericho State Capital Corp. of Florida and Lynx Jericho Partners, LLC are the
Appellants,

And Chicago Title Insurance Company is the Respondent.

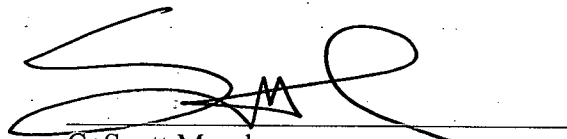
APPELLANTS' MOTION FOR EXTENSION OF TIME
TO FILE INITIAL REPLY BRIEF OF APPELLANTS

Appellants hereby move for an extension of time in which to file the Initial Reply Brief of
Appellants and states the following grounds in support thereof:

1. The Respondent's Initial Brief is 50 pages long, and the issues presented in this appeal are
complicated, requiring considerable devotion of time and research.

2. Two weekends fell within the 10 time period, essentially leaving the undersigned five working days to respond, which is inadequate time to fully reply to all the matters raised by the Respondent and pertinent to the appeal.
3. Appellants received the Respondent's Initial Brief on Monday, February 5, 2018 and inadvertently calculated the time to respond from that date. The undersigned was in Florida this past weekend through yesterday evening (Monday, February 12, 2018) meeting with clients on an unrelated matter. The undersigned's legal assistant who had been assigned to this case, and who was the employee most familiar with assisting with appeals, retired soon after Appellants' Initial Brief was filed, and the only other legal assistant in the office familiar with appellate work took a new job last week, leaving the undersigned rather shorthanded with preparing the Reply Brief.
4. The Initial Reply Brief of the Appellants is being submitted simultaneously herewith, and the undersigned respectfully submits that granting said extension, which upon information and belief is two extra days, will not prejudice the parties.

Appellants respectfully request an extension to submit their Initial Reply Brief, attached hereto.



C. Scott Masel
Newby Sartip Masel & Casper, LLC
P.O. Box 808
Myrtle Beach, SC 29578
843/449-9417
Attorney for Appellants

February 13, 2018

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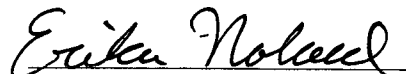
Of whom Jericho State Capital Corp. of Florida and Lynx Jericho Partners, LLC are the Appellants,

And Chicago Title Insurance Company is the Respondent.

CERTIFICATE OF SERVICE

I, Erika Noland, and employee of Newby, Sartip, Masel & Casper, LLC, attorneys for the Appellants, hereby certify that on this date February 13, 2018, I have served a copy of the (i) **Motion for Extension to File Initial Reply Brief** and (ii) **Initial Reply Brief of Appellants** in the above case upon counsel for the Respondent via U.S. Mail, addressed as follows:

Demetri "Jim" K. Koutrakos
1812 Lincoln Street, Suite #200
Columbia, SC 29202


Erika Noland
February 13, 2018

NEWBY, SARTIP, MASEL & CASPER, LLC
ATTORNEYS AT LAW

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C. SCOTT MASEL†□
JULIET M. CASPER□†
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February 13, 2018

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
P.O. Box 11629
Columbia, SC 29211

VIA FEDEX OVERNIGHT

RE: Jericho State Capital v. Chicago Title Insurance
Lynx Jericho partners v. Chicago Title Insurance
Appellate Case No.: 2017-001646

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Dear Ms. Kitchings:

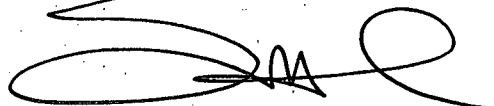
Enclosed please find the following:

1. Appellants' Motion for Extension to File the Initial Reply Brief and \$25 filing fee;
2. Appellants' Initial Reply Brief; and
3. Certificate of Service; as to both the Motion and Initial Reply Brief.

By copy of the enclosed, the same are being served upon Respondent's counsel. Please let me know of any questions or comments.

Very truly yours,

NEWBY, SARTIP, MASEL & CASPER



C. Scott Masel

Enclosures

Cc (w/enc): Demetri "Jim" K. Koutrakos

J

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SCOTT MASEL

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UNITED STATES US

BILL SENDER

TO CLERK OF COURT
SOUTH CAROLINA COURT OF APPEALS
1220 SENATE STREET

COLUMBIA SC 29211

(803) 734-1890

REF: JERICO

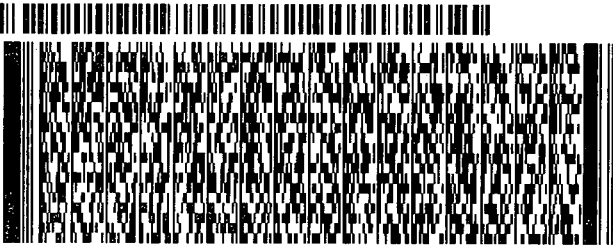
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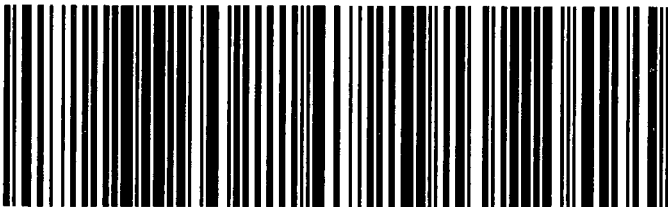
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SC Court of Appeals

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