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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2015-CP-10-3389
Appellate Case No. 2018-000084

RECEIVED

JUL 02 2018

SC Court of Appeals

Peter Miller, Mary Alice Miller, Mary Alice Miller, as Trustee
of Mary Alice Miller Living Trust, Miller Group Properties, LLC,
and C-Miller Properties, LLC, Plaintiffs,

Of whom C-Miller Properties, LLC is the Appellant,

v.

Marilyn L. Dillon and JLJ, LLC, Respondents,

and

Marilyn L. Dillon, Third-Party Plaintiff, Respondent,

v.

PMC, LLC, Third-Party Defendant.

**RESPONDENTS' MOTION FOR EXTENSION OF TIME
TO FILE THEIR INITIAL BRIEF AND DESIGNATION
OF MATTER TO BE INCLUDED IN THE
RECORD ON APPEAL**

Pursuant to Rule 240 of the South Carolina Rules of Appellate Practice, Respondents,
Marilyn L. Dillon and JLJ, LLC, hereby move this Court for an Order granting an extension of
time during which to file their Initial Brief and Designation Of Matter To Be Included In The

Record On Appeal. For the reasons set forth below, Respondents request an additional period of fourteen days from July 2, 2018, during which to file these documents.

The additional time requested, beyond the extension of time previously granted by the Court, is warranted given the complexity of the legal issues presented. The fourteen-day extension will not prejudice Respondents or Appellant or affect their legal rights.

Respondents intend to work diligently and to file their Initial Brief and Designation Of Matter as soon as practicable. However, for the reasons stated above, Respondents respectfully request that the Court grant a fourteen-day extension of time during which they may file their Initial Brief and Designation Of Matter.

July 2, 2018

By: *R. Hunter R*
per Carmelo B. Sammataro (SC Bar No. 69746)
Ian D. McVey (SC Bar No. 71196)
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ATTORNEYS FOR RESPONDENTS

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and C-Miller Properties, LLC, Plaintiffs,

Of whom C-Miller Properties, LLC is the Appellant,

v.

Marilyn L. Dillon and JLJ, LLC, Respondents,

and

Marilyn L. Dillon, Third-Party Plaintiff, Respondent,

v.

PMC, LLC, Third-Party Defendant.

PROOF OF SERVICE

I certify this 2nd day of July 2018 that I have served a copy of RESPONDENTS' MOTION FOR EXTENSION OF TIME TO FILE THEIR INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL upon other counsel of record, by mailing same, postage prepaid in the United States mail, addressed to the following:

Beth Burke Richardson, Esquire
Jasmine D. Smith, Esquire
Sowell Gray Robinson Stepp & Laffitte, LLC
P. O. Box 11449
Columbia, SC 29211
Attorneys for Appellant

July 2, 2018

By: *R. Hunter Platt*
for Carmelo B. Sammataro (SC Bar No. 69746)
Ian D. McVey (SC Bar No. 71196)
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July 2, 2018

VIA HAND DELIVERY:

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

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JUL 02 2018

SC Court of Appeals

Re: Peter Miller, et al. v. Marilyn L. Dillon, et al.
Appellate Case No.: 2018-000084
File No.: 13698.101

Dear Ms. Kitchings:

Enclosed please find the originals and one copy each of Respondents' Motion for Extension of Time to File their Initial Brief and Designation Of Matter to be Included in the Record on Appeal along with a Proof of Service regarding the above-referenced matter. Please file the originals and return clocked copies to me via our office courier. Thank you for your assistance with this matter, and please contact me if you have any questions.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.



for Carmelo B. Sammataro

CBS/rbb

Enclosures

cc: Beth Burke Richardson, Esquire
Jasmine D. Smith, Esquire
(w/enc.)