

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CLARENDON COUNTY  
Court of Common Pleas

George McFaddin, Jr., Circuit Court Judge

Case No. 2015-CP-14-0615

**RECEIVED**  
AUG 02 2018  
SC Court of Appeals

TLC Holdings, LLC, Richard Clark, and  
Jimmy S. Lovell,..... Respondents,

v.

M.B. Hutson a/k/a M.B. Hudson,..... Appellant.

MOTION FOR EXTENSION OF TIME TO FILE BRIEF AND  
DESIGNATION OF MATTER

Appellant M.B. Hutson, with the consent of respondents, hereby moves for an extension of time to file its initial brief and designation of matter in this matter, and in support thereof shows the Court as follows:

1. Appellant's initial brief and designation of matter is due to be filed with the Court on 9 August 2018.
2. The parties have voluntarily agreed to a mediation of this matter in the hopes of resolving their differences; that mediation is scheduled for Wednesday, September 12. This mediation will also include a related declaratory judgment action pending in the South Carolina trial courts.

3. A successful mediation in this matter would promote judicial economy and dispense with the need for this appeal and the related declaratory judgment action.

4. With the consent of the respondents, appellant hereby moves for an extension of time to file its brief and designation of matter to 9 October 2018, following the scheduled mediation.

This the 1st day of August.

Frank J. Gordon  
S.C. Bar No. 71769  
Millberg Gordon Stewart PLLC  
1101 Haynes St., Ste. 104  
Raleigh, NC 27604  
919-836-0090

James B. Richardson, Jr.  
S.C. Bar No. 4718  
1229 Lincoln Street  
Columbia, SC 29201  
803-799-9412

by: Frank J. Gordon  
Attorneys for Appellant.

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CLARENDON COUNTY  
Court of Common Pleas

**RECEIVED**

George McFaddin, Jr., Circuit Court Judge

AUG 02 2018

SC Court of Appeals

Case No. 2015-CP-14-0615

TLC Holdings, LLC, Richard Clark, and  
Jimmy S. Lovell,..... Respondents,

v.

M.B. Hutson a/k/a M.B. Hudson,..... Appellant.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Brief and Designation of Matter on the respondents by depositing a copy of it in the United States Mail, postage paid, on August 1, 2018, addressed to their attorney of record, John S. Wilkerson, III, Turner Padgett Graham & Laney, Post Office Box 22129, Charleston, South Carolina 29413.

August 1, 2018.

Frank J. Gordon  
S.C. Bar No. 71769  
Millberg Gordon Stewart PLLC  
1101 Haynes St., Ste. 104  
Raleigh, NC 27604  
919-836-0090

James B. Richardson, Jr.  
S.C. Bar No. 4718

1229 Lincoln Street  
Columbia, SC 29201  
803-799-941  
Attorneys for Appellant

by: Frank J. Gordon  
Attorneys for Appellant.

RALEIGH, NC | FLORENCE, SC  
919.836.0090 (NC) | 843.206.0030 (SC)

MAILING ADDRESS:  
1101 HAYNES STREET, SUITE 104  
RALEIGH, NC 27604  
919.836.8027 (FAX)

KERRI M. ELLIOTT  
PARALEGAL  
KELLIOTT@MGSATTORNEYS.COM

August 1, 2018

**VIA FEDERAL EXPRESS**

Ms. Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
John C. Calhoun Bldg.  
1220 Senate St.  
Columbia, SC 29201

**RECEIVED**

AUG 02 2018

SC Court of Appeals

RE: TLC Holdings, LLC v. M.B. Hutson  
Appellate Case No.: 2018-000936

Dear Ms. Kitchings:

Please find enclosed for filing an original and six copies of a Motion For Extension of Time to File Brief and Designation of Matter in the above-referenced case. The applicable \$25.00 filing fee is enclosed as well. We ask that you also return a file-stamped copy of the motion to us in the enclosed self-addressed, stamped envelope.

Thank you for your assistance and cooperation in this matter. Please do not hesitate to contact us with any questions.

Very truly yours,

*Kerri M. Elliott*

Kerri M. Elliott

Enclosures

cc: John S. Wilkerson, III  
James B. Richardson, Jr.

ORIGIN ID:RZZA (919) 836-0090  
KERRI ELLIOTT  
MILLBERG, GORDON & STEWART  
1101 HAYNES STREET, SUITE 104

SHIP DATE: 01AUG18  
ACTWGT: 1.00 LB  
CAD: 5519323/INET4040

RALEIGH, NC 27604  
UNITED STATES US

BILL SENDER

TO **CLERK, JENNY ABBOTT KITCHINGS**  
**SOUTH CAROLINA COURT OF APPEALS**  
**JOHN C. CALHOUN BLDG.**  
**1220 SENATE ST.**  
**COLUMBIA SC 29201**

562J16309IDCA5

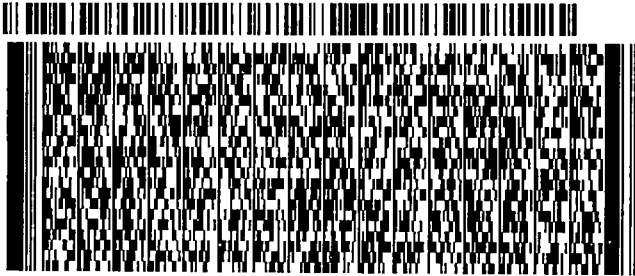
(803) 734-1890

REF: HUTSON

INV:  
PO:

DEPT:

FedEx Ship Manager - Print Your Label(s)



**FedEx**  
Express



4182018072201ur

THU - 02 AUG 10:30A

PRIORITY OVERNIGHT

TRK#

0201

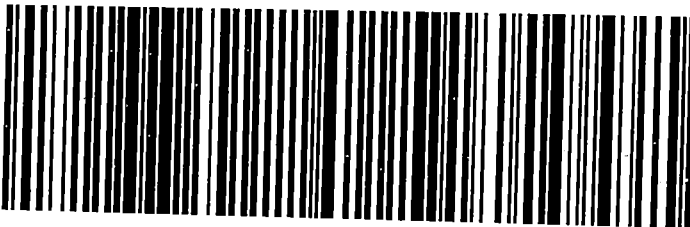
7728 7417 8881

**XH USCA**

29201

SC-US

CAE



**RECEIVED**

AUG 02 2018

SC Court of Appeals

8/1/2018