

**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-14-00615  
Appellate Case No.: 2018-000936

**RECEIVED**  
**OCT 22 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.

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

Respondents TLC Holdings, LLC, Richard Clark, and Jimmy S. Lovell, with the consent of appellant, hereby move for an extension of time to file its Initial Brief and Designation of Matter in this action, and in support thereof show the Court as follows:

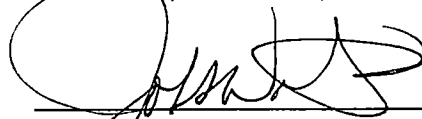
1. Respondents' Initial Brief and Designation of Matter are due to be filed with the Court on November 8, 2018.
2. The parties have voluntarily agreed to a mediation of this matter in the hopes of resolving their differences; that initial mediation was scheduled for Wednesday, September 12, 2018, however inclement weather forced postponement. A new date for mediation has been

scheduled for November 2, 2018 and 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 appellant, respondents hereby move for an extension of time to file its Initial Brief and Designation of Matter to December 8, 2018, following the scheduled mediation.

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



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John S. Wilkerson, III (SC Bar No.: 6105)  
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Charleston, South Carolina 29413-2129  
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**ATTORNEYS FOR RESPONDENTS**

October 17, 2018

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CLARENDON COUNTY  
Court of Common Pleas

George McFaddin, Jr., Circuit Court Judge

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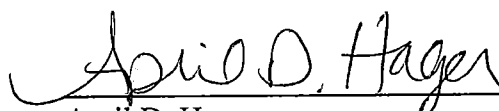
M.B. Hutson a/k/a M.B. Hudson, ..... Appellant.

PROOF OF SERVICE

I hereby certify that this 17<sup>th</sup> day of October, 2018, a copy of the *Respondents'*  
*Motion for Extension of Time to File Initial Brief and Designation of Matter* has been served  
upon all counsel of record by placing same in the United States Mail, postage prepaid, to:

Frank J. Gordon (SC Bar No.: 71769)  
Millberg Gordon Stewart PLLC  
1101 Haynes Street, Suite 104  
Raleigh, NC 27604  
*Attorneys for Appellant*

James B. Richardson, Jr. (SC Bar No.: 4718)  
1229 Lincoln Street  
Columbia, SC 29201  
*Attorney for Appellant*

  
\_\_\_\_\_  
April D. Hager

# Turner | Padget

**John S. Wilkerson, III**

**REPLY TO:**

**E-Mail: [jwilkerson@TurnerPadget.com](mailto:jwilkerson@TurnerPadget.com)  
Writer's Direct Dial: (843) 576-2801  
Writer's Direct Fax: (843) 577-1649**

October 17, 2018

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

**RECEIVED**  
OCT 22 2018  
SC Court of Appeals

Re: TLC Holdings, LLC, Richard Clark and Jimmy Lovell  
v. M.B. Hutson a/k/a M.B. Hudson  
Appellate Case No.: 2018-00936  
Our File No.: 12916.102

Dear Ms. Kitchings:

Enclosed please find the original and two copies of Respondents' Motion for Extension of Time to File Initial Brief and Designation of Matter for the above referenced matter. Also enclosed is our firm's check in the amount of \$25.00 for the filing fee. Please file the original and return the file-stamped copies to us in the enclosed postage paid, envelope.

Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.

  
John S. Wilkerson, III

JSW/adh

Enclosures

cc: Mr. Frank J. Gordon  
Mr. James B. Richardson, Jr.

12916.102

**Turner | Padgett**

P.O. Box 22129, Charleston, SC 29413

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Ms. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
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Columbia, SC 29201

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