

STATE OF SOUTH CAROLINA
In The Court Of Appeals

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OCT 30 2018

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
G. Thomas Cooper, Jr., Circuit Court Judge

Appellate Case No. 2018-000723

James R. Zedosky, Lenore K. Zedosky, Douglas Shea, and Sally SheaRespondents

v.

D.R. Horton, Inc. and Town of Blythewood..... Defendants,
Of Which D.R. Horton, Inc. isAppellant

**MOTION FOR AN ADDITIONAL 30-DAY EXTENSION OF TIME TO FILE INITIAL
BRIEF OF RESPONDENTS JAMES R. ZEDOSKY, LENORE K. ZEDOSKY, DOUGLAS
SHEA, AND SALLY SHEA AND DESIGNATION OF MATTER**

Respondents James R. Zedosky, Lenore K. Zedosky, Douglas Shea, and Sally Shea (“Respondents”), by and through their undersigned counsel respectfully request an additional 30-day extension of time, or until December 8, 2018 to file the Initial Brief and Designation of Matter for Respondents James R. Zedosky, Lenore K. Zedosky, Douglas Shea, and Sally Shea, which is currently due on November 8, 2018.

This is the second extension requested since the original deadline in this matter. The request is based on the filing of the Motion to Amend Caption to add Town of Blythewood as a Respondent filed by Appellant in this matter, which Motion is still pending. Respondents’ respectfully request that all parties to the appeal be properly added and identified prior to the filing by Respondents of the Initial Brief and Designation of Matter. This Motion is further based on counsel’s workload for counsel and staff.

Respectfully submitted,

[signature block next page]



M. Alan Peace (S.C. Bar No. 4384)
Taylor A. Peace (S.C. Bar No. 100206)
Harrell, Martin & Peace, P.A.
P.O. Box 1000
Chapin, South Carolina 29036
(803) 345-3353
*Attorneys for Respondents James R. Zedosky,
Lenore K. Zedosky, Douglas Shea, and Sally Shea*

October 29, 2018
Chapin, South Carolina

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PROOF OF SERVICE

I hereby certify that I have served a copy of the **MOTION FOR AN ADDITIONAL 30 DAY EXTENSION OF TIME TO FILE INITIAL BRIEF OF RESPONDENTS JAMES R. ZEDOSKY, LENORE K. ZEDOSKY, DOUGLAS SHEA, AND SALLY SHEA AND DESIGNATION OF MATTER** in the above referenced case has been served on October 29, 2018, on the following by causing a copy to be delivered via the U.S. Postal Service to Counsel to the addresses shown below:

T. McRoy Shelley, III, Esquire
Rogers Townsend & Thomas, PC
PO Box 100200
Columbia, SC 29202-1390
Attorneys for Appellant, D.R.
Horton, Inc.

Andrew Lindemann, Esquire
Lindemann, Davis & Hughes, PA
PO Box 6923
Columbia, SC 29260
Attorney for Town of Blythewood

Michael Tighe, Esquire
Alden Terry, Esquire
Callison Tighe & Robinson, LLC
PO Box 1390
Columbia, SC 29202-1390
Attorney for Town of Blythewood



M. Alan Peace (S.C. Bar No. 4384)
Taylor A. Peace (S.C. Bar No. 100206)
Harrell, Martin & Peace, P.A.
P.O. Box 1000
Chapin, South Carolina 29036
(803) 345-3353
*Attorneys for Respondents James R. Zedosky,
Lenore K. Zedosky, Douglas Shea, and Sally Shea*

HARRELL, MARTIN & PEACE, P.A.

ATTORNEYS AND COUNSELORS AT LAW

135 Columbia Avenue

Post Office Box 1000

Chapin, South Carolina 29036

TELEPHONE: 803-345-3353

FAX: 803-345-9171

hmp-law.com.com

L.K. "Trey" Harrell, III
Jeremy C. Martin
*M. Alan Peace ***
Jennifer Dowd Nichols
Taylor A. Peace
Andrea "Andi" Cornelison

*Robert W. Dibble, Jr. **
*William Jennings (Bill) Buchanan **
*Donald W. Tyler **
*Thomas B. Jackson, III **

**Of Counsel*

***Certified Mediator/Arbitrator*

October 29, 2018

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

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SC Court of Appeals

Re: **James R. Zedosky, Lenore K. Zedosky, Douglas Shea, and Sally Shea v. D.R. Horton, Inc. and Town of Blythewood**

Appellate Case No.: 2018-000723

Case No. 2017-CP-40-04437

Our File No.: 3347.28229/MAP

Dear Ms. Kitchings:

Our law firm represents the Respondents, James R. Zedosky, Lenore K. Zedosky, Douglas Shea, and Sally Shea, in the above referenced matter. Enclosed please find an original and seven (7) copies of the Respondents James R. Zedosky, Lenore K. Zedosky, Douglas Shea, and Sally Shea's Motion for an Additional 30-day Extension of Time of Respondents to File Initial Brief and Designation of Matter. Also enclosed is our firm's check in the amount of \$25.00 for the filing fee. Please file the originals and return a clocked copy to me in the self-addressed envelope provided.

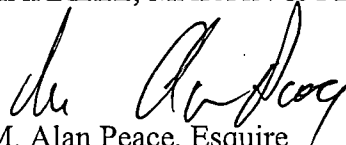
By copy of this letter, I am serving all counsel of record with a copy of the same

J

Thank you for your assistance with this matter.

Sincerely,

HARRELL, MARTIN & PEACE, P.A.



M. Alan Peace, Esquire

MAP/tsm
Enclosures

cc: T. McRoy Shelley, III, Esq. (w/enclosures) via U.S. Mail
Andrew Lindemann (w/enclosures) via U.S. Mail
Michael Tighe, Esq. (w/enclosures) via U.S. Mail
Alden Terry, Esq. (w/enclosures) via U.S. Mail

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Tracy Slice Moore
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