

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
harrellmartinpeace.com

88754
+ 88755

L.K. "Trey" Harrell, III
Jeremy C. Martin
*M. Alan Peace ***
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*

January 10, 2019

Amelia -

Per our conversations, please find attached our check for the remainder of the filing fees.

RECEIVED
JAN 10 2019
SC Court of Appeals

STATE OF SOUTH CAROLINA
In The Court Of Appeals

RECEIVED

JAN 09 2019

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

SC Court of Appeals

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
And Town of Blythewood is a Respondent

**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 (“Zedosky Respondents”), by and through their undersigned counsel respectfully request a 30 day extension of time, or until February 8, 2019 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 January 9, 2019.

This is the third extension requested since the original deadline in this matter. The first extension request was granted on October 5, 2018. Upon the filing of the second extension request on October 30, 2018, the Court issued its Order dated November 1, 2018 staying all filing requirements pending the Court’s ruling on Appellant’s Motion to Amend Caption to add Town of Blythewood as an additional Respondent. The Court issued its Order on December 10, 2018 adding Town of Blythewood as an additional Respondent and gave all Respondents thirty (30) days to file their Initial Briefs and Designation of Matter.

This request is based on the fact that counsel for Zedosky Respondents was just made aware today, January 9, 2019, that the Court had issued an Order adding Town of Blythewood as a Respondent and establishing today as the deadline for filing Respondents’ Initial Briefs and Designation of Matter. After being notified of such, Zedosky Respondents’ counsel’s paralegal contacted the Court regarding the Order and was informed that the Order filed on December 10, 2018 was mailed to Zedosky Respondents’ counsel’s physical address of 135 Columbia Ave.,

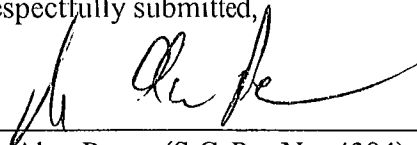
Chapin, South Carolina 29036. Although this is Zedosky Respondents' counsel's physical address, it is not the address Zedosky Respondents' counsel uses to receive mail. The correct mailing address for Zedosky Respondents' counsel is P.O. Box 1000, Chapin, South Carolina 29036. Apparently other items of mail have also been sent to the physical address in this case and have been returned to the Court undelivered. Zedosky Respondents' counsel has corrected the deficiency with the Attorney Information System at the South Carolina Bar website the morning of January 9, 2019. Based on receipt of notice that the deadline is today, counsel does not have sufficient time to prepare and file the Initial Brief and Designation of Matter on behalf of Zedosky Respondents and respectfully requests a 30 day extension of time.

Additionally, the request is based on the fact that the parties will be engaging in settlement negotiations during this time and the additional 30-day extension will assist in those negotiations.

Furthermore, Zedosky Respondents understand that counsel for Co-Respondent Town of Blythewood is also filing a Motion for an additional 30-Day extension today with the Court to file the Initial Brief and Designation of Matter for Co-Respondent today. Upon information and belief, the parties will not be prejudiced and the case will not be delayed further by the granting of the request for extension.

Counsel for Zedosky Respondents has discussed this request for an additional 30 day extension with counsel for Appellant D.R. Horton, Inc., and counsel for Co-Respondent both have consented to the relief requested herein.

Respectfully submitted,



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*

January 9, 2019
Chapin, South Carolina

HARRELL MARTIN & PEACE, P.A.
Rebecca D. Baker, Paralegal
135 Columbia Avenue
Post Office Box 1000
Chapin, SC 29036

Appellate Case No. 2018-000723

SC Court of Appeals
Attn: Amelia Smith

RECEIVED
JAN 10 2019
SC Court of Appeals