

89504

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

APPEAL FROM CHARLESTON COUNTY
The Honorable Mikell R. Scarborough, Master in Equity

RECEIVED
APR 10 2019
SC Court of Appeals

Case No. 2015-CP-10-000979
Appellate Case No. 2018-001971

RS Custom Homes, n/k/a RS General Contracting, LLC,.....Respondent

v.

Matthew David DeNapoli, Lindsay Ann DeNapoli, Branch Banking & Trust, N.A., and
Mortgage Electronic Registration Systems, Inc.,

Of whom, Matthew David DeNapoli, Lindsay Ann DeNapoli are Appellants

**REQUEST FOR EXTENSION OF TIME TO SERVE INITIAL BRIEF
AND DESIGNATION OF MATTER**

COME NOW the Respondents, RS Custom Homes, n/k/a RS General Contracting, LLC,
and hereby request a thirty (30) day extension of time to serve and file their Initial Brief and
Designation of Matter upon the Appellants, respectfully showing as follows:

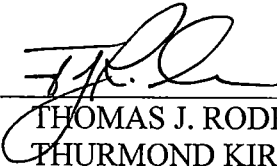
1. By letter to the Court dated March 7, 2019, Respondents' Counsel requested a thirty
(30) day extension of time to file their Initial Brief and Designation of Matter, which was their
first such request. This Court granted Respondent's initial extension by letter.

2. Respondents hereby request an additional thirty (30) days in order for new co-
counsel to complete his review of the record and the development of his response to Appellants'
Initial Brief. The additional thirty (30) days is expected to be sufficient to provide the
Respondents' new co-counsel with time to finalize his efforts.

WHEREFORE Respondents respectfully request that this Court issue an Order granting unto the Respondents a thirty (30) day extension to time to file the Initial Brief and Designation of Matter.

Respectfully submitted this 8th day of April, 2019.

THURMOND KIRCHNER TIMBES & YELVERTON, P.A.

BY: 
THOMAS J. RODE, SC bar No. 77480
THURMOND KIRCHNER & TIMBES, P.A.
15 Middle Atlantic Wharf, Suite 101
Charleston, South Carolina 29401
Telephone: (843) 937-8000
Facsimile: (843) 937-4200
Email: thomas@tktlawyers.com
Attorney for the Appellants

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APR 10 2019

APPEAL FROM CHARLESTON COUNTY SC Court of Appeals
The Honorable Mikell R. Scarborough, Master in Equity

Appellate Case No. 2018-001971

RS Custom Homes, n/k/a RS General Contracting, LLC,.....Respondent
v.

Matthew David DeNapoli, Lindsay Ann DeNapoli, Branch Banking & Trust, N.A., and
Mortgage Electronic Registration Systems, Inc.,

Of whom, Matthew David DeNapoli, Lindsay Ann DeNapoli are Appellants

CERTIFICATE OF SERVICE

I, Caroline Boyce, pursuant to Rule 5(b)(1), SCRPC, and counsel's regular business practices, do hereby certify that, on this date, I served a true and correct copy of the within documents upon the individuals and counsel identified below at their last known address by:

- Hand Delivery
- U.S. Mail, with sufficient postage affixed thereto
- Certified Mail, Return Receipt Requested, Restricted Delivery
- Other: _____

Frank M. Cisa, Esq.
Cisa & Dodds, LLP
858 Lowcountry Blvd.
Mt. Pleasant, SC 29464
843-881-6530
frank@cisadodds.com

Ronald G. Tate
Gallivan White and Boyd,
PA
PO Box 10589
Greenville, SC 29603
864-271-9580
rtate@gwblawfirm.com

Jeffery A. Ross
Jeff Ross Law, LLC
1100 Queensborough Blvd
Ste. 200
Mt. Pleasant, SC 29464
843-329-4040
jross@jeffrosslaw.com

[signature to follow]

April 8, 2019
Charleston, SC

By: Caroline Boyce
Caroline Boyce
Paralegal to Thomas J. Rode

THURMOND KIRCHNER



& TIMBES, P.A.

ATTORNEYS AT LAW

15 Middle Atlantic Wharf

Charleston, SC 29401

o: 843.937.8000

f: 843.937.4200

www.TKTLawyers.com

April 8, 2019

VIA US MAIL & FAX

The Hon. Jenny A. Kitchings

S.C. Court of Appeals

PO Box 11629

Columbia, SC 29211

803-734-1839

*Re: RS Custom Homes v. DeNapoli et. al.
Lower Court Number 2015-CP-10-00979
Appellate Case No. 2018-001971*

RECEIVED
APR 10 2019
SC Court of Appeals

Dear Mrs. Kitchings,

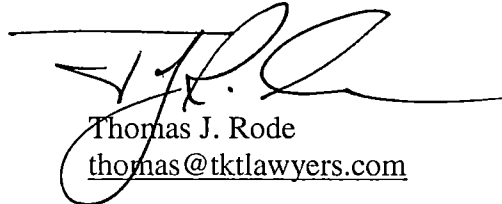
Enclosed please find for filing the following:

1. The original and six (6) copies of my Request for Extension of Time to Serve Initial Brief in the above referenced matter.

By this letter I am serving all counsel of record with the same.

With best regards, I remain

Very truly yours,

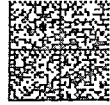


Thomas J. Rode
thomas@tktlawyers.com

TJR

Cc: All counsel of record

FIRST-CLASS



US POSTAGE

02 1P \$ 001.60⁰
0001183577 APR 08 2019
MAILED FROM ZIP CODE 29401

THURMOND KIRCHNER
& TIMBES, P.A.
ATTORNEYS AT LAW

15 Middle Atlantic Wharf
Charleston, South Carolina 29401

The Hon. Jenny A. Kitchings
S.C. Court of Appeals
PO Box 11629
Columbia, SC 29211

RECEIVED
APR 10 2019
SC Court of Appeals