

90034

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Daniel D. Hall,  
Chief Administrative Judge

Case No. 2018-CP-46-02818

**RECEIVED**

JUN 17 2019

SC Court of Appeals

LAUREL MEADOWS HOME OWNERS ASSOCIATION, by  
and through JEFF SOCHKO, member and owner .....  
Plaintiff/Appellant

v.

DEBBIE MCDONAGH and JIMMY MCDONAGH, acting as the  
acting board of directors and ARC for Laurel Meadows non-profit  
HOA; THE LAUREL MEADOWS HOMEOWNERS  
ASSOCIATION, INC.....Defendants

\*\*\*\*\*

**PLAINTIFFS'-APPELLANTS' CONSENT MOTION FOR EXTENSION OF TIME  
TO FILE PLAINTIFFS'- APPELLANTS' INITIAL BRIEF**

\*\*\*\*\*

NOW COMES the Plaintiffs-Appellants, by and through counsel, and respectfully  
moves this Court, pursuant to Rules 208 and 240 of South Carolina Rules of Appellate  
Procedure, for a forty-five (45) day extension of time within which to file and serve Appellant's  
Initial Brief in this action, and in support thereto shows unto the Court as follows:

1. Appellants' counsel received the electronic transmittal of the transcript on May 17, 2019.
2. Appellants' brief is currently due on June 17, 2019.
3. Appellant was granted secured leave from June 4, 2019 through June 14, 2019.
4. Due to the secured leave, Appellants' counsel has been unable to prepare Appellants' brief.
5. Additionally, Appellants and Appellees are currently negotiating a resolution of this matter.
6. Appellees consent to this Motion to Extend the briefing deadline by 45 days.
7. The time for filing and serving Appellant's Brief has not expired.

8. Appellants and Appellees are working together in good faith to settle this matter and this motion is filed in good faith, and is not filed for the purpose of delay.

9. Appellants have not previously sought an extension of time for any other matters pertaining to this appeal.

10. Accordingly, for good cause shown herein, the undersigned requests an Order of this Court allowing Appellant an extension of 45 days to file Appellants' Initial Brief, up to and including August 1, 2019.

WHEREFORE, Plaintiffs-Appellants respectfully moves this Court for an extension of time of 45 days within which to file Appellant's Brief in this matter, up to and including August 1, 2019

This the 14<sup>th</sup> day of June, 2019

Sellers, Ayers, Dortch & Lyons, P.A



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bdressler@sellersayers.com  
Appellant's Lawyer

CONSENTED TO BY:



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J. Nathaniel Pierce, S.C. Bar No. 102803  
Morton & Gettys, LLC  
Attorney for Defendants  
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T: 803.366.3388  
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Appellee's Lawyer

**Certificate of Service**

I certify that I served all counsel of record a copy of the foregoing Notice of Appeal via US Mail, as follows, on this 14<sup>th</sup> day of June 2019:

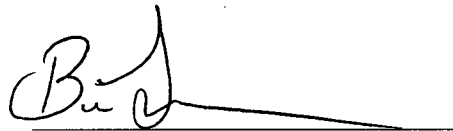
Mr. Nate Pierce  
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Fountain Park Place  
331 E Main St Suite 300  
Rock Hill, SC 29730

Mr. Cam Haldford  
238 Rockmont Dr,  
Fort Mill, SC 29708

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A handwritten signature in cursive script, appearing to read "Brice", followed by a horizontal line extending to the right.

Brice Thompson  
Paralegal to Brett Dressler

**SELLERS, AYERS, DORTCH & LYONS, P.A.**

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††† Also Admitted in Texas  
‡ Certified Mediator

CHARLES E. LYONS II \* (1960-2016)

June 14, 2019

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SC Court of Appeals

**VIA FEDEX:**

South Carolina Court of Appeals  
Attention: Filings  
1220 Senate Street  
Columbia, South Carolina 29201

*Re: Laurel Meadows Homeowners Association, by and through Jeff Sochko v. Debbie McDonagh, et al.*

To whom it may concern:

Enclosed please a Motion to Extend Briefing Deadline, for filing in connection with the referenced action and a check for \$50.00 for the fees associated with this filing.

Upon filing the Motion to Extended Briefing Deadline, please return a filed copy to us in the enclosed envelope.

Thank you for your assistance.

Sincerely,



Brice Thompson  
Paralegal to Brett Dressler

BNT/bnt  
Enclosures

ORIGIN ID: QWGA (704) 377-5050  
SARAH FRYE  
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SHIP DATE: 14JUN19  
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UNITED STATES US

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TO **FILINGS DEPARTMENT**  
**SOUTH CAROLINA COURT OF APPEALS**  
**1220 SENATE STREET**

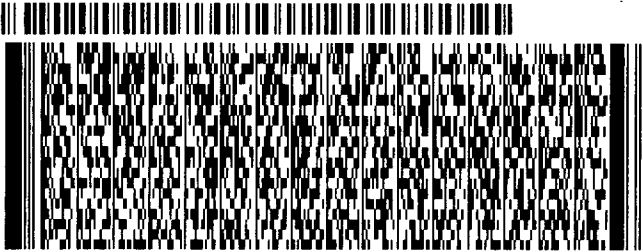
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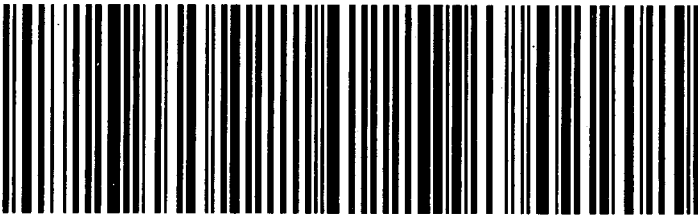
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**JUN 17 2019**

**SC Court of Appeals**

6/14/2019