

90058

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM LANCASTER COUNTY  
Court of Common Pleas  
Lancaster County Civil Action Number 2018-CP-29-01191

**The Honorable Kristi F. Curtis, Circuit Court Judge,**

Appellate No. \_\_\_\_\_

**J.A. Seagraves d/b/a J.A. Seagraves City Wide Paving, .....**Appellant,

v.

**North Regional III, LLC, .....**Respondent

**RECEIVED**

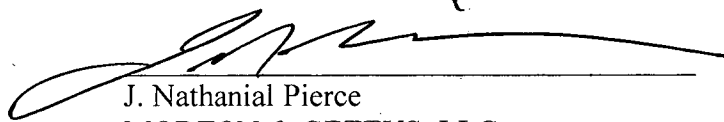
JUL 12 2019

SC Court of Appeals

**MOTION FOR EXTENSION OF TIME**

Counsel for J.A. Seagraves d/b/a J.A. Seagraves City Wide Paving, J. Nathaniel Pierce of Morton & Gettys, LLC, hereby moves the Court to grant permission to file the Notice of Intent to Appeal outside of the filing deadline determined by Rules 203 and 262. Counsel for Appellant intended to mail the notice of appeal, certificate of electronic notification, copy of ordering being challenged, and filing fee on July 3, 2019. Due to clerical error, the original package and fee was mailed to Lancaster County. A copy of the filing, Federal Express Envelope, and filing fee check are attached to this motion as Exhibit "A." Counsel for Appellant was only made aware of this error on July 11, 2019. The 30-day deadline for Appellant to file the Notice of Intent to Appeal has not expired and will not expire until July 17, 2019. Counsel requests the Court grant this motion for extension of time on the above grounds.

July 11, 2019

A handwritten signature in black ink, appearing to read 'J. Nathaniel Pierce', is written over a horizontal line.

J. Nathaniel Pierce  
MORTON & GETTYS, LLC  
P.O. Box 707  
Rock Hill, SC 29731

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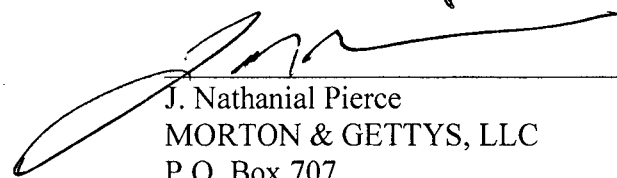
v.

North Regional III, LLC, .....Respondent.

**PROOF OF SERVICE**

The undersigned certifies that he has served this Motion for Extension of Time by depositing a copy of it in the United States Mail, postage prepaid, on July 11, 2019, addressed to Brian McCoy at 378 East Main Street; Rock Hill, SC 29730.

July 11, 2019

  
\_\_\_\_\_  
J. Nathaniel Pierce  
MORTON & GETTYS, LLC  
P.O. Box 707  
Rock Hill, SC 29731  
Attorney for Appellant

MORTON & GETTYS  
ATTORNEYS AT LAW

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JUL 12 2019

SC Court of Appeals

July 11, 2019

Via Fedex

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

**RE: JA Seagraves dba JA Seagraves City Wide Paving v. North  
Regional III, LLC**

Ms. Kitchings:

Enclosed please find the original and one copy of the motion for extension of time. Also enclosed please find our firm's check in the amount of \$50.00 (Fifty and 00/100 dollars) for the filing of the same.

Should this motion be granted, please file the enclosed notice of appeal package. You will also find our firm's check in the amount of \$250.00 (Two Hundred Fifty and 00/100 dollars) for the filing of the same.

Please file the originals and return any clocked copies in the self-addressed stamped envelope provided.

Please do not hesitate to contact our office with any questions. Nate Pierce can be reached directly at 803-366-3414. With kind regards, I am

Sincerely,

  
Leah Anderson McCraney  
Paralegal for J. Nathaniel Pierce

LAM/

enclosures

cc: Brian McCoy, Esquire

A LIMITED LIABILITY COMPANY

JAMES M. MORTON

JOHN P. GETTYS, JR. \*

MICHAEL B. SMITH †

JOSHUA B. VANN

ELIZABETH SMITH OWEN

J. RICHARDS MCCRAE, III

MELISSA G. CASSELL §

JOSEPH L. RAAD ¶

DANIEL J. BALLOU ○

J. NATHANIAL PIERCE §

LYNELLE D. MORGAN □

DAVIS C. RIDDLE

LANCE F. JOHNSON ▲

BEVERLY A. CARROLL §\*‡

Certified Civil Court Mediator \*

Certified Circuit Court Arbitrator & †

Certified Family Court Mediator

Certified Specialist in Estate Planning  
and Probate Law ¶

Certified Specialist in Employment Law ‡

Licensed in SC & NC §

Licensed in SC & TX ○

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