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STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**  
OCT 28 2019  
SC Court of Appeals

APPEAL FROM LANCASTER COUNTY  
Court of Common Pleas  
Lancaster County Civil Action Number 2018-CP-29-0111

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

Appellate No. 2019-001143

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

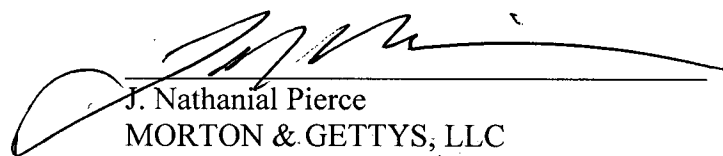
v.

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

**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 a 45-day stay of all filing requirements. The parties reached an agreement in principle to settle this case. The court granted a 45-day stay of all filing requirements in order to finalize the settlement and transfer funds. Since the court's order, Respondent has experienced issues acquiring funds for the settlement proceeds and needs additional time to do so. The parties hereby consent to an additional 45-day stay of all filing requirements in order to finalized settlement and payment. Counsel requests the Court grant this motion for extension of time on the above grounds.

October 24, 2019

A handwritten signature in black ink, appearing to read 'J. Nathaniel Pierce', is written over a horizontal line. The signature is fluid and cursive, with a large loop at the beginning and a long, sweeping tail.

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

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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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,

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

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

v.

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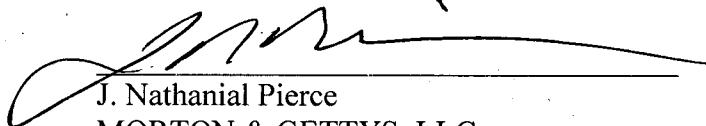
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**PROOF OF SERVICE**

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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 October 24, 2019, addressed to Brian McCoy at 378 East Main Street; Rock Hill, SC 29730.

October 24, 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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SC Court of Appeals

October 24, 2019

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**  
**Appellate Number: 2019-001143**  
**M&G Matter Number: 18-1120-10-P**

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. Please file the original and return any clocked copy 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 McCrahey  
Paralegal for J. Nathaniel Pierce

LAM/

enclosures

cc: Brian McCoy, Esquire

JAMES M. MORTON  
JOHN P. GETTYS, JR. \*  
MICHAEL B. SMITH †  
JOSHUA B. VANN  
ELIZABETH SMITH OWEN  
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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 §  
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Licensed in MI & SC ◻  
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The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

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