

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas
Lancaster County Civil Action Number 2018-CP-29-0119

The Honorable Kristi F. Curtis, Circuit Court Judge,

Appellate No. 2019-001143

RECEIVED
JAN 30 2020
SC Court of Appeals

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

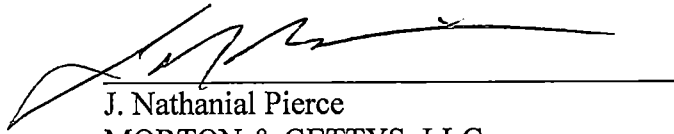
v.

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.

January 28, 2020

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

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

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,

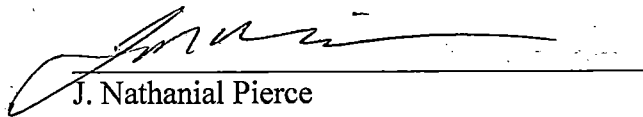
v.

North Regional III, LLC,Respondent.

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 January 28, 2020, addressed to Brian McCoy at 378 East Main Street; Rock Hill, SC 29730.

January 28, 2020



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

RECEIVED
JAN 30 2020
SC Court of Appeals

MORTON & GETTYS

ATTORNEYS AT LAW

JAMES M. MORTON

JOHN P. GETTYS, JR. *

MICHAEL B. SMITH †

JOSHUA B. VANN

ELIZABETH SMITH OWEN

J. RICHARDS MCCRAE, III

MELISSA G. CASSELL ◆

DANIEL J. BALLOU ●

JOSEPH L. RAAD †

J. NATHANIAL PIERCE §

LYNELLE D. MORGAN ■

DAVIS C. RIDDLE

LANCE F. JOHNSON ▲

BEVERLY A. CARROLL §*†

JOE TERRIOUS K. NEAL

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 ●

Licensed in SC & MI ■

Licensed in GA & IL ▲

Licensed in SC, NC, GA ◆

January 28, 2020

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
Morton & Gettys 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 McCraney
Paralegal for J. Nathaniel Pierce

LAM/

enclosures

cc: Brian McCoy, Esquire

www.mortongettys.com

Fountain Park Place
331 E Main Street, Suite 300
Post Office Box 707
Rock Hill, SC 29731
office 803.366.3388
fax 803.366.4044

A LIMITED LIABILITY COMPANY

RECEIVED
JAN 30 2020
SC Court of Appeals

MORTON & GETTYS
ATTORNEYS AT LAW

Fountain Park Place
331 E Main Street, Suite 300
PO Box 707
Rock Hill, SC 29731

RECEIVED

JAN 30 2020

SC Court of Appeals



FP  **US POSTAGE**
\$000.65⁰

First-Class

ZIP 29730

01/28/2020

036B 0011811296

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