

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

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The Honorable Charles B. Simmons, Jr., Master in Equity

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Appellate Case No. 2019-001821  
Circuit Court Case No. 2018-CP-23-3124

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SC Court of Appeals

I, the undersigned attorney for the Respondents, Ivan Martinez and Paula Martinez, do hereby certify that I have served the below parties in this action with a copy of the Respondents' request for an extension by mailing a copy of the same via U.S. Mail to the following addresses:

**PARTIES SERVED:**

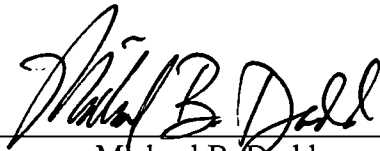
M. Todd Carroll  
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1221 Main Street  
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*Attorneys for the Appellants Oriole Properties, LLC and Rallis Holdings, LLC*

M. Stokely Holder  
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110 W. North Street, Suite 100  
Greenville, SC 29601

*Attorneys for the Respondent Clear Skies Restoration, LLC*

*Signature Page Attached*



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Michael B. Dodd

The Dodd Law Firm, LLC

13 Sevier Street

Greenville, SC 29605

*Attorney for the Respondents Ivan Martinez and Paula Martinez*

March 5, 2020

**The Dodd Law Firm, LLC**

Michael B. Dodd, Attorney  
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March 5, 2020

The Honorable Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
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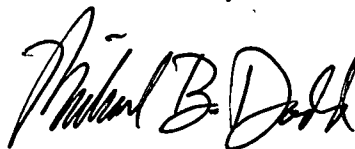
RE: Oriole Properties, LLC v. Ivan Martinez  
Appellate Case No. 2019-001821

Dear Ms. Kitchings,

I am writing today to notify the court that although represented Ivan and Paula Martinez in the Court of Common Pleas case, Greenville County case numbered 2018-CP-23-03124, I have just now been retained formally to represent them as the Respondents in this appeal. My office did receive a copy of Appellants brief at my office on February 17, 2020.

Because the rule states service is complete upon mailing, I believe that puts the brief of the Respondents due March 11, 2020. Because of the short amount of time, I respectfully request an extension of thirty days to make the appropriate filings. The new deadline to file and serve their initial brief would then be Friday, April 10, 2020. Thank you in advance for the court's consideration of this request.

Sincerely,



Michael B. Dodd

Enclosures  
Cc: All counsel of record

*The Dodd Law Firm, LLC*  
13 Sevier Street  
Greenville, SC 29605



The Honorable Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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