

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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MAR 30 2020

APPEAL FROM HORRY COUNTY
Benjamin H. Culbertson, Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2019-001485
Trial Court Case No. 2019-CP-26-00345

Michael Marceda and Cheryl Marceda,..... Appellants,

v.

Winchester Oceanview Development, Inc., Sands
Building Group, Inc., C3 Studio, LLC, Sands Realty
Group, Inc., Johnathan B. Dickerson, and John
Woodward,..... Defendants,

Of which C3 Studio, LLC, is the Respondent.

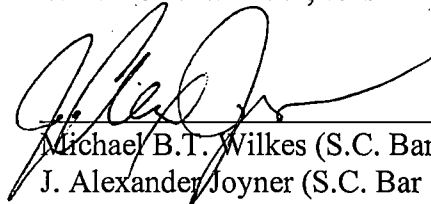
MOTION FOR EXTENSION OF TIME

Respondent respectfully moves this Court for an Order pursuant to Rule 263(b), SCACR, for a forty-five (45) day extension of time in which to file and serve its Final Brief, which at present is due on March 26, 2020. This motion is not made for the purpose of undue delay, and is the first request for an extension of time.

Counsel seeks additional time due to unexpected logistical difficulties resulting from the COVID-19 pandemic, including but not limited to City of Charleston Emergency Ordinance 2020-042, mandating a "Stay at Home" order.

Counsel for Appellant has consented to this motion for an extension of time. With the requested extension, Respondent's Final Brief would be due Monday, May 11, 2020.

WILKES LAW FIRM, P.A.



Michael B.T. Wilkes (S.C. Bar 6107)

J. Alexander Joyner (S.C. Bar 101771)

200 Meeting St., Suite 205

Charleston, SC 29401

(843) 737-6229

Attorneys for Respondent

March 25, 2020

Other Counsel of Record:

Lane D. Jefferies, Esq.

Eric M. Poulin, Esq.

Roy T. Willey, IV, Esq.

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32 Ann Street

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Attorneys for Appellants

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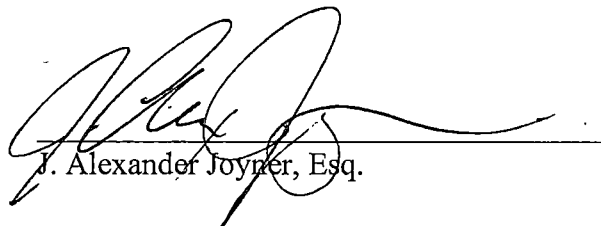
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Building Group, Inc., C3 Studio, LLC, Sands Realty
Group, Inc., Johnathan B. Dickerson, and John
Woodward,..... Defendants,

Of which C3 Studio, LLC, is the Respondent.

PROOF OF SERVICE

I certify that I have served the *Motion for Extension of Time* on the following counsel of record by depositing a copy of it in the United States Mail, postage prepaid, on **March 25, 2020**.

Lane D. Jefferies, Esq.
Eric M. Poulin, Esq.
Roy T. Willey, IV, Esq.
Ivey B. Franklin, Esq.
Anastopoulo Law Firm, LLC
32 Ann Street
Charleston, SC 29403
Attorneys for Appellants


J. Alexander Joyner, Esq.

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MICHAEL B.T. WILKES**
ELLEN S. CHEEK*
C. DANIEL ATKINSON**
J. ALEXANDER JOYNER*
W. SPENCER BARROW

- CHARLESTON OFFICE
- ALSO MEMBER GEORGIA BAR
- ALSO MEMBER NORTH CAROLINA BAR
- CERTIFIED MEDIATOR

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March 25, 2020

Via U.S. Mail Only

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

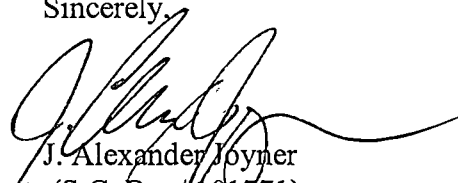
Re: *Michael Marceda; and Cheryl Marceda, Appellants, v. C3 Studio, LLC, et al,*
Respondents
In the Court of Appeals for the State of South Carolina
Appellate Case No. 2019-001485

Dear Ms. Kitchings:

Enclosed for filing in the referenced matter an original and one copy of the *Motion for Extension of Time* and *Proof of Service*. Please file same and return a filed copy to me in the envelope provided.

If you have any questions, please advise.

Sincerely,


J. Alexander Joyner
(S.C. Bar #101771)
ajoyner@wilkeslaw.com

JAJ:mkc

Enclosures

cc: Michael Wilkes, Esq. (via email only)
Lane D. Jefferies, Esq. (via email only)

Eric M. Poulin, Esq. (via email only)
Roy T. Willey, IV, Esq. (via email only)
Ivey B. Franklin, Esq. (via email only)

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LAW FIRM P.A.**

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