

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Grace G. Knie, Circuit Court Judge

Case No. 2016-CP-42-0727

**RECEIVED**

**May 20 2020**

**SC Court of Appeals**

William A Morgan

Respondent,

v.

Sterling Estates Homeowner's  
Association, Inc. and Paul Thomas  
Garner

Defendants.

Of whom

Paul Thomas Garner

is

Appellant.

**MOTION FOR EXTENSION OF TIME**

The undersigned does hereby move, pursuant to Rule 263(b) for an Order extending the time within which the Appellant shall file and serve the Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal on the Respondents in the above-captioned matter, which current deadline is May 22, 2020. The undersigned respectfully requests an additional thirty (30) days within which to file and serve such matters, which would make the Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal due on June 21, 2020.

This Motion is due to Appellant's counsel's workload in the preceding 30 days and issues with workflow related to current state of emergency.

s/ M. Kyle Thompson  
M. Kyle Thompson  
Willson Jones Carter & Baxley, P.A.  
872 S. Pleasantburg Drive  
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[mkthompson@wjlaw.net](mailto:mkthompson@wjlaw.net)  
Attorney for Appellant

May 20, 2020

Other Counsel of Record:

Jason Michael Imhoff  
The Ward Law Firm, PA  
233 S. Pine St., P.O. Box 5663  
Spartanburg, SC 29304  
Attorney for Respondent

Damon C. Wlodarczyk, Esquire  
Riley Pope & Laney, LLC  
2838 Devine Street  
Columbia, SC 29205  
Attorney for Defendant Sterling Estates Homeowner's Association, Inc.

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PROOF OF SERVICE

I certify that I have served the Motion for Extension on William A Morgan by depositing a copy of it in the United States Mail, postage prepaid, and electronic mail on May 20, 2020, addressed to his attorney of record, Jason Imhoff, The Ward Law Firm, PA, 233 S. Pine St., P.O. Box 5663, Spartanburg, SC 29304 and to Damon C. Wlodarczyk, Riley Pope & Laney, LLC, 2838 Devine Street, Columbia, SC 29205

May 20, 2020



M. Kyle Thompson  
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Attorney for Appellant

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May 20, 2020

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

**RECEIVED**  
**May 20 2020**  
**SC Court of Appeals**

Re: William A. Morgan vs. Paul T. Garner et al.  
Appellate case No.: 2019-002122  
Claim No.: 0404806069; DOL: 39/2016  
WJC&B File No.: 0222.00126

Dear The Honorable Kitchings:

Enclosed please find the original and one copy of the Motion for Extension in the above-captioned case. Please file the original and return a clocked copy to us in the self-addressed, enclosed envelope.

With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.

  
M. Kyle Thompson

MKT/jab  
Enclosures

cc: Jason Imhoff, Esquire  
Damon C. Wlodarczyk, Esquire

# WILLSON JONES CARTER & BAXLEY, P.A.

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**NAME:** Court of Appeals  
**FAX:** 803-734-1839  
**FROM:** Julie A. Brown  
(864) 908-3816  
**RE:** William A. Morgan vs. Paul T. Garner et al.  
**FILE #:** 2016-CP-42-0727

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**May 20 2020**  
**SC Court of Appeals**

**COMMENTS:** For filing.

**NUMBER OF PAGES INCLUDING THIS COVER SHEET:** 5

**DATE:** May 20, 2020

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**Our File No.:** 0222.00126