

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

Karl A. Folkens, Special Referee
Fifteenth Judicial Circuit

RECEIVED

Jul 13 2020

SC Court of Appeals

Case Nos. 2015-CP-26-1084 / 2013-CP-26-5530 (combined)
Appellate Case No. 2017-001646

Jericho State Capital Corp. of Florida, Plaintiff
v.
Chicago Title Insurance Company, Defendant

AND

Lynx Jericho Partners, LLC, Plaintiff
v.
Chicago Title Insurance Company, Defendant

Of whom Jericho State Capital Corp. of Florida and Lynx Jericho Partners, LLC
are the Appellants

and Chicago Title Insurance Company is the Respondent.

RESPONDENT CHICAGO TITLE INSURANCE COMPANY’S MOTION FOR
AN EXTENSION OF TIME TO FILE ITS REPLY TO APPELLANTS’
RETURN TO RESPONDENT’S PETITION FOR REHEARING AND
SUGGESTION FOR REHEARING *EN BANC*

Respondent Chicago Title Insurance Company (“Chicago Title”), by and through its undersigned counsel, hereby moves the Court for a ten-day extension within which to file its Reply to the Appellants’ Return to Chicago Title’s Petition for Rehearing and Suggestion for Rehearing *En Banc*.

Chicago Title and its counsel request this extension because the undersigned's contact at Chicago Title is out of the office and out of town, the undersigned's schedule, and the short time frame within which to prepare and file the Reply. This request is necessary to ensure there is enough time to both draft the Reply and to have the Reply approved by Chicago Title for submission.

The Reply is currently due July 16, 2020, but with the requested extension it would be due July 27, 2020 (July 26 being a Sunday).

The undersigned has conferred with counsel for Appellants and Appellants do not object to this request.

Chicago Title requests all timelines be held in abeyance while the Court considers this request.

Respectfully submitted,

s/ Demetri K. Koutrakos
Demetri K. Koutrakos, SC Bar #11318
Louis H. Lang, SC Bar #3127
Harry A. Dixon, SC Bar #103509
CALLISON TIGHE & ROBINSON, LLC
1812 Lincoln Street, Suite #200
P. O. Box 1390
Columbia, SC 29202-1390
Telephone: 803-404-6900
Facsimile: 803-404-6902
Email: jimkoutrakos@callisontighe.com
Email: louislang@callisontighe.com
Email: harrydixon@callisontighe.com

ATTORNEYS FOR RESPONDENT

July 13, 2020

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Of whom Jericho State Capital Corp. of Florida and Lynx Jericho Partners, LLC
are the Appellants

and Chicago Title Insurance Company is the Respondent.

PROOF OF SERVICE

I hereby certify that, on this date, the **Respondent Chicago Title Insurance Company's Motion for an Extension of Time to File its Reply to Appellants' Return to Respondent's Petition for Rehearing and Suggestion for Rehearing *En Banc*** was served on Appellants' counsel via AIS email, pursuant to Supreme Court Order dated March 20, 2020, as amended, on July 13, 2020, as follows:

C. Scott Masel, Esquire
Fred B. Newby, Esquire
Newby, Sartip, Masel & Casper, LLC
P. O. Box 808
Myrtle Beach, SC 29578
Telephone: 843-449-9417

Email: fnewby@newbylaw.com
Email: smasel@newbylaw.com
(Attorneys for Appellants)

A copy of the service email is attached hereto, as required.

I further certify that all parties required by Rule to be served have been served.

s/ Demetri K. Koutrakos
Demetri K. Koutrakos, SC Bar #11318
Louis H. Lang, SC Bar #3127
Harry A. Dixon, SC Bar #103509
CALLISON TIGHE & ROBINSON, LLC
1812 Lincoln Street, Suite #200
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Telephone: 803-404-6900
Facsimile: 803-404-6902
Email: jimkoutrakos@callisontighe.com
Email: louislang@callisontighe.com
Email: harrydixon@callisontighe.com

ATTORNEYS FOR RESPONDENT

July 13, 2020

Kathy Romero

From: Kathy Romero
Sent: Monday, July 13, 2020 9:51 AM
To: Scott Masel; fnewby@newbylaw.com
Cc: Jim Koutrakos; Harry Dixon; Louis Lang
Subject: Jericho vs. Chicago Title / Appellate Case No. 2017-001646
Attachments: Clerk.002.pdf; Motion for Extension for Reply.pdf; Proof of Service - Motion for Extension for Reply .pdf

Dear Mr. Masel and Mr. Newby,

Attached please find Respondent Chicago Title Insurance Company's Motion for an Extension of Time to file its Reply to Appellants' Return to Respondent's Petition for Rehearing and Suggestion for Rehearing *En Banc*, Proof of Service, and letter to the appellate clerk regarding the above-referenced matter. The attached documents are being filed with the Court of Appeals today. Thank you.

With kind regards,

Kathy Romero
Legal Assistant to Demetri "Jim" K. Koutrakos, Esq.
Callison Tighe & Robinson, LLC
1812 Lincoln Street, Suite #200
P. O. Box 1390
Columbia, SC 29202-1390
Telephone: 803-404-6900
Facsimile: 803-404-6902
Email: kathyromero@callisontighe.com

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SC Court of Appeals

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Demetri "Jim" K. Koutrakos
803-404-6900
JimKoutrakos@callisontighe.com

July 13, 2020

RECEIVED
Jul 13 2020
SC Court of Appeals

VIA EMAIL: ctappfilings@sccourts.org
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

RE: Jericho State Capital Corp. of Florida vs. Chicago Title Insurance Company
Lynx Jericho Partners, LLC vs. Chicago Title Insurance Company
Appellate Case No. 2017-001646

Dear Ms. Kitchings:

Enclosed herewith please find the Respondent Chicago Title Insurance Company's Motion for an Extension of Time to File its Reply to Appellants' Return to Respondent's Petition for Rehearing and Suggestion for Rehearing *En Banc*, together with the Proof of Service, in the above-referenced matter. Kindly file the same and return a clocked-in copy of each to the undersigned via return email. It is my understanding that, pursuant to Supreme Court Order dated March 20, 2020 as amended, no filing fee is required for this Motion.

The enclosed documents have been served upon Appellants' counsel today via email as indicated in the Proof of Service.

Please feel free to contact me with any questions. Thank you.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

s/ Demetri "Jim" K. Koutrakos

Demetri "Jim" K. Koutrakos

DKK:ksr
Enclosures
cc (via email): C. Scott Masel, Esquire
Fred B. Newby, Esquire
Louis H. Lang, Esquire
Harry A. Dixon, Esquire
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