

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
Thomas A. Russo, Circuit Judge

**RECEIVED**  
**Aug 11 2020**  
**SC Court of Appeals**

Appellate Case No. 2020-000054

Noel Owens,.....Appellant,

v.

Mountain Air Heating & Cooling, South Market Real Estate, Demetra Caldera, and  
Ronald Gilmer, Defendants,

Of whom South Market Real Estate and Demetra Caldera are the.....Respondents.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE INITIAL  
REPLY BRIEF (WITH REGARD TO RESPONDENT CALDERA) AND ANY  
REPLY DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON  
APPEAL

Appellant hereby moves pursuant to Rule 263(b), SCACR, for a 10-day extension, to August 24, 2020, of the time in which to serve and file the Appellant's initial reply brief and any reply designation of matter to be included in the record on appeal concerning Respondent Caldera's respondent's brief. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. Respondent Caldera served her initial respondent's brief on August 3, 2020, making Appellant's initial reply brief concerning Respondent Caldera due on August 13, 2020.

2. Appellant's counsel was on vacation last week and has not had the time to review Respondent Caldera's brief and draft the reply brief.
3. Appellant requests short 10-day extension of the present deadline, which should be sufficient time to get the reply brief written.
4. This appeal is a young one, and this is the first extension sought of the subject deadline. Appellant's counsel anticipates no need for another.
5. Respondent Caldera's counsel consents to the extension sought.
6. Accordingly, Appellant's counsel believes there is good cause to grant the requested extension.
7. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Appellant prays for an order extending to to August 24, 2020, the time in which to serve and file the Appellant's initial reply brief and any reply designation of matter to be included in the record on appeal concerning Respondent Caldera's respondent's brief.

Respectfully submitted,

/s/ Andrew S. Radeker  
Andrew S. Radeker  
S.C. Bar No. 73743  
Harrison, Radeker & Smith, P.A.  
Post Office Box 50143  
Columbia, South Carolina 29250  
(803) 779-2211  
drew@harrisonfirm.com  
Attorney for Appellant

August 11, 2020

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PROOF OF SERVICE

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I certify that I served the foregoing motion for extension in this case by  
providing a copy of it by email to opposing counsel at the email address(es) shown  
below and on the date shown below:

Margaret A. Collins, Esq., at meg@pslawsc.com;  
Kelley R. Leddy, Esq., at kelley@salleylawfirm.com and kleddy@finkellaw.com; and  
William R. Padget, Esq., at bpadget@finkellaw.com

Respectfully submitted,

/s/ Andrew S. Radeker  
Andrew S. Radeker  
S.C. Bar No. 73743  
Harrison, Radeker & Smith, P.A.  
Post Office Box 50143  
Columbia, South Carolina 29250  
(803) 779-2211  
drew@harrisonfirm.com  
Attorney for Appellant

August 11, 2020