

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Larry B. Hyman
Case No. 2009-CP-26-12046

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MAR 05 2013

SC Court of Appeals

First American Title Insurance Company Respondent,

v.

Michele Paddy Refosco, Attorney at Law, Defendant and Third Party Plaintiff,

v.

AmeriSearches, LLC and Wade Schaffner, Third Party Defendant,

Of Whom

AmeriSearches, LLC and Wade Schaffner are Appellants.

And

Michelle Paddy Refosco and First American Title Insurance Company are ... Respondents.

**RESPONDENT FIRST AMERICAN TITLE INSURANCE COMPANY'S
MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, First American Title Insurance Company (“Respondent”) hereby moves for an Order granting it a thirty (30) day extension of time in which to file its Initial Brief and Designation of Matter.

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And

Michelle Paddy Refosco and First American Title Insurance Company are ... Respondents.

CERTIFICATE OF SERVICE

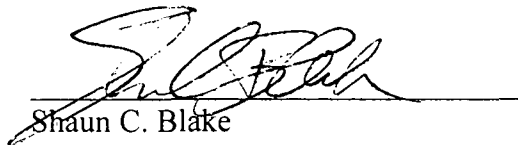
I certify that I have served Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter on Appellants, AmeriSearches, LLC and Wade Schaffner by depositing a copy of it in the United States Mail, postage prepaid, on March 5, 2013, addressed to their attorney of record, J. Dwight Hudson, Esq., Hudson Law Offices, 1203

Respondent contends that the extension of time is necessary due to the fact that its appellate counsel maintains a considerable workload that has required counsel to work outside of his office for the majority of the past month, and counsel requires additional time to research and properly prepare Respondent's Initial Brief. The undersigned has consulted with counsel for Appellants and counsel for the Co-Respondent regarding this Motion, and these counsel consent to the request for the extension and do not oppose the Motion.

Therefore, Respondent First American Title Insurance Company respectfully requests that this Court hold the current briefing schedule in abeyance pending its decision on the Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter.

Respectfully Submitted:

March 5, 2013



Shaun C. Blake
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ATTORNEYS FOR RESPONDENT
FIRST AMERICAN TITLE INS. CO.

48th Avenue North, Suite 11, Myrtle Beach, South Carolina 29577; and on Co-Respondent, Michelle Paddy Refosco, Attorney at Law, by depositing a copy of it in the United States Mail, postage prepaid, on March 5, 2013, addressed to Daniel J. MacDonald, Esq., Rice, MacDonald & Hicks, P.A., 950-48th Avenue North, Suite 200, Myrtle Beach, SC 29577.

March 5, 2013


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March 5, 2013

Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter St.
Columbia, South Carolina 29201

RE: First American Title Ins. Co. v. Michele Paddy Refosco, Attorney at Law and
Michelle Paddy Refosco, Attorney at Law v. AmeriSearches, LLC and Wade
Schaffner
Case Tracking No. 2012-213001
Case No. 2009-CP-26-12046
Our File No. 168-00112

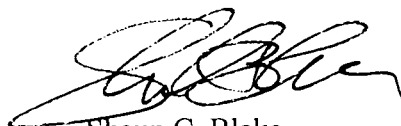
Dear Ms. Kitchings:

Enclosed herein for filing please find an original and six (6) copies of **Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter** in the above-referenced matter. Please file the original and return a clocked-in copy of same to my office using the enclosed self-addressed, postage paid envelope. Our firm's check in the amount of \$25.00 is included herein for the required filing fee.

Thank you for your assistance in this matter and should you otherwise have any questions or comments, please do not hesitate to contact me.

With kindest regards, I am

Sincerely,



Shaun C. Blake

Enclosure(s)

cc: (w/ encl.)
J. Dwight Hudson, Esq.
Daniel J. MacDonald, Esq.