

**McDONALD PATRICK POSTON HEMPHILL & ROPER, LLC**

ATTORNEYS AND COUNSELORS AT LAW

414 MAIN STREET

GREENWOOD, S. C. 29646

KENNETH W. POSTON  
ROY R. HEMPHILL  
W. LEE ROPER, II  
STEVEN M. PRUITT  
DOUGLAS L. BELL  
HANNAH K. METTS

NANCY T. HOBBS\*  
\*Also admitted in NC

September 30, 2020

OF COUNSEL  
WILLIAM B. PATRICK, JR.  
JAMES E. McDONALD

MAILING ADDRESS  
P. O. BOX 1547  
GREENWOOD, S. C. 29648

TELEPHONE  
(864) 388-1006  
FAX  
(864) 229-5327  
E-MAIL  
dbell@mcdonaldpatrick.com

Honorable Jenny Abbott Kitchings  
Court of Appeals Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**

**Sep 30 2020**

**SC Court of Appeals**

Re: Annie L. Myers, et al., Respondents v. Town of Calhoun Falls and  
Savannah Valley Trails, Inc., Appellants  
Appellate Case No. 2020-000578

Dear Ms. Kitchings:

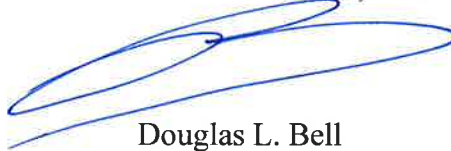
Please accept this letter as our request for an extension of time to respond to the Initial Brief of Respondents, which is due on October 1, 2020. We are kindly requesting an additional ten days to file our response extending the deadline to October 12, 2020.

By copy of this letter to all counsel of record, I am notifying them of this request, as evidenced by the Proof of Service.

If you have any questions, please do not hesitate to let me know.

Yours truly,

McDONALD PATRICK POSTON  
HEMPHILL & ROPER, LLC



Douglas L. Bell

DLB/lhb  
Enclosure

Cc: C. Rauch Wise, Esq.

**RECEIVED**

**Sep 30 2020**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

**APPELLATE CASE NO. 2020-000578**

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**APPEAL FROM THE SOUTH CAROLINA COURT OF COMMON PLEAS**

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**CIVIL ACTION NOS.: 2018-CP-01-00094 AND 2018-CP-01-00250**

**Annie L. Myers, Billy R. Nobles, M. Elaine Nobles, James Lewis Willis, James and Lucille Mason, Joann Atkinson, Willie Clyde Smith, Clyde H. Broadwell, Jr., and Stephen Pettigrew of Sawney Creek Farm, LLC, James Tuberville, Dean Burton, Robert W. and Minnie O. New, Walter L. Anders and Mary and Homer Martin, Respondents,**

**v.**

**Town of Calhoun Falls and Savannah Valley Trails, Inc., Appellants.**

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**PROOF OF SERVICE**

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I, Douglas L. Bell, attorney for Appellant above-named, hereby certify that the request for an extension of time to respond to the Initial Brief of Respondents has been served upon the attorney for the Respondents, along with a copy of this Proof of Service, by electronic mail, on this 30<sup>th</sup> day of September, 2020 addressed as follows:

C. Rauch Wise, Esq.  
rauchwise@gmail.com

September 28, 2020

S/Douglas L. Bell  
Douglas L. Bell, Esquire  
McDonald Patrick Poston  
Hemphill & Roper, LLC  
414 Main Street  
P.O. Box 1547  
Greenwood, SC 29646  
Attorneys for Appellants, Town of Calhoun  
Falls and Savannah Valley Trails, Inc.