

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

The Honorable James E. Chellis  
Dorchester County Master-in-Equity

Case No. 2020-001168

**RECEIVED**

DEC 29 2020

SC Court of Appeals

NCP PILGRIM, LLC,

Respondent,

v.

MARY LOU CERCOPELY, DAVID S. CLANCY, SOUTH CAROLINA FEDERAL  
CREDIT UNION, SOUTHCOAST COMMUNITY BANK, JOAN GEANURACOS, and  
DAVID SEAN CLANCY,

of whom MARY LOU CERCOPELY, DAVID S. CLANCY,  
and DAVID SEAN CLANCY are the Appellants.

RESPONDENT'S MOTION FOR EXTENSION OF TIME

Pursuant to Rules 240(c) and 263(b), SCACR, Respondent hereby submits the within motion for extension of the deadline for filing and serving its initial brief.

Respondent's initial brief is due on December 24, 2020. Respondent respectfully requests an extension of time in which to file its initial brief, in light of Respondent's recent request for relief under Rule 245 (Case No. 2020-001567) and motion to certify the appeal to the South Carolina Supreme Court under Rule 204(b) (Case No. 2020-001574), which were filed with the Supreme Court on December 3, 2020, and are currently pending before the Court (collectively "Motions"). Respondent respectfully requests that it be granted an extension of time which

amounts to thirty (30) days from the date of the South Carolina Supreme Court's rulings on the above referenced Motions, within which to file its initial brief.

**WHEREFORE**, Respondent respectfully requests an extension of thirty (30) days from the date of the South Carolina Supreme Court's rulings on the above referenced Motions, within which to file its initial brief.

Respectfully submitted,

/s/ Lauren P. Williams

Russell P. Patterson

Lauren P. Williams

Russell P. Patterson, P.A.

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Attorneys for Respondent,

NCP Pilgrim, LLC

Hilton Head Island, South Carolina  
December 22, 2020

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

James E. Chellis, Master in Equity

Case No. 2020-001168

NCP PILGRIM, LLC,

Respondent,

v.

MARY LOU CERCOPELY, DAVID S. CLANCY, SOUTH CAROLINA FEDERAL  
CREDIT UNION, SOUTHCOAST COMMUNITY BANK, JOAN GEANURACOS, and  
DAVID SEAN CLANCY,

of whom MARY LOU CERCOPELY, DAVID S. CLANCY,  
and DAVID SEAN CLANCY are the

Appellants.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date indicated below counsel for Appellants was served with a copy of the Motion for Extension of Time by mailing a copy of the same via E-mail and First Class, U.S. Mail, postage-paid on the date set forth below.

Robert Bratton Varnado, Esquire  
Brown & Varnado, LLC  
P.O. Box 1127  
Mt. Pleasant, SC 29465

Respectfully submitted,

/s/ Lauren P. Williams  
Russell P. Patterson  
Lauren P. Williams  
Russell P. Patterson, P.A.  
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December 22, 2020

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Serving the Lowcountry for over 35 years

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December 22, 2020

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

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SC Court of Appeals


Re: **NCP Pilgrim, LLC v. Mary Lou Cercopely, et al.**  
**Appellate Case No.: 2020-001168**

Dear Ms. Kitchings:

Enclosed please find the original and one (1) copy of Respondent's Motion for Extension of Time and a Certificate of Service in the above referenced matter. I have also enclosed a check in the amount of \$25.00 for the motion filing fee. I submitted this Motion for filing via One Drive on December 22, 2020. If necessary, please file the original with the records of your office and return a clocked copy to me in the enclosed envelope.

Please contact our office if you have any questions.

Sincerely,  
RUSSELL P. PATTERSON, P.A.

  
Lauren P. Williams

Enclosures

cc: Robert Varnado, Esq. – w/encl.  
NCP Pilgrim, LLC – w/encl.

**Russell P. Patterson, P.A.** 

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The Honorable Jenny Abbott Kitchings  
Clerk of Court South Carolina Court of Appeals  
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