

RECEIVED

Jan 06 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Case No. 2020-001027

JOHN MICHAEL TIMMONS, JR., d/b/a TAVERN ON THE LOOP, Appellant

v.

FIRST RELIANCE BANK, INC.; THE BLANTON COMPANY, INC.;
JBJR ENTERPRISES, INC. d/b/a THE BLANTON COMPANY, INC.;
WW PLASMA II, LLC; DALE PORTER; F.R. SAUNDERS, JR.;
HUNTER WILLIAMS; and JOSEPH B. BLANTON, individually, Defendants,

Of Which FIRST RELIANCE BANK, INC.; DALE PORTER;
F.R. SAUNDERS, JR. are the, Respondents,

And

WW PLASMA II, LLC and HUNTER WILLIAMS are the Defendants.

APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Appellant John Michael Timmons respectfully requests that the Court grant Appellant an additional ten (10) days in which to file his Reply Brief. The due date for Respondents' Initial Brief fell on December 25, 2020, but due to the Christmas holiday was not due until December 29, 2020 when it was filed prior to the New Year holiday. The due date for Appellant's Reply is January 8, 2021. Counsel for Appellant has been on a long planned family vacation during the holidays and will quarantine before returning to the office. Appellant respectfully submits an extension of time is

appropriate in order to allow Appellant to fully reply to the issues raised in Respondents' Initial Brief and due to the COVID-19 emergency.

Appellant respectfully requests the time to file his Reply Brief be extended to January 18, 2021.

January 6, 2021

/s/ David D. Ashley
David D. Ashley (S.C. Bar #76206)
Ben Le Clercq (S.C. Bar # 65754)
Le Clercq Law Firm
David@LeClercqLaw.com
Ben@LeClercqLaw.com
708 South Shelmore Blvd. #202
Mount Pleasant, SC 29464
Phone (843) 722-3523
Fax (843) 352-2977
Counsel for Appellant

Other Counsel of Record:
D. Gary Lovell, Jr., Esquire
Lacey Houghton, Esquire
Copeland, Stair, King & Lovell LLP
40 Calhoun Street
Suite 400
Charleston, SC 29401
(843) 727-0307
Counsel for Respondents