

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**  
JUL 22 2021  
SC Court of Appeals

APPEAL FROM GREENWOOD COUNTY  
Court of Common Pleas

Frank R. Addy, Jr. Circuit Court Judge

Appellate Case No. 2021-000286

ROCK CREEK CAPITAL, LLC,

Respondent,

v.

TYNISAH BROWN,

Appellants.

**MOTION FOR EXTENSION**

Pursuant to Rule 240, SCACR, Respondents, Rock Creek Capital, LLC, request an extension of the deadline for filing their initial brief and designation of matter.

“Statutes and rules of courts should be construed liberally in favor of the right to appeal.” *Wieters v. Bon-Secours-St. Francis Xavier Hosp., Inc.* 378 S.C. 160, 167, 662 S.E.2d 430, 434 (Ct. App. 2008), *See also; Haughton v. Order of United Commercial Travelers of Am.*, 108 S.C. 73, 74–75, 93 S.E. 393, 394 (1917); *O'Rourke v. Atl. Paint Co.*, 91 S.C. 399, 403, 74 S.E. 930, 931 (1912). Respondents respectfully request this extension on the grounds that counsel for

Respondent has had numerous court appearances out of county and two prescheduled trips out of town during the pendency of the time for initial briefing. Further, the parties have been in negotiations to potential reach an agreement that would render this action moot and therefore a continuance would be in the interest of judicial economy. No party is prejudiced by the Court granting Respondents an extension of time for filing their initial brief and designation of matter.

Respectfully submitted,

**CLARKSON & HALE, LLC**

By: 

Eric C. Hale, Esq. (SC Bar # 71768)  
Clarkson & Hale, LLC  
P.O. Box 287  
Columbia, SC 29202

July 21, 2021  
Columbia, South Carolina

CERTIFICATE OF SERVICE


I hereby certify that I have served a copy of the foregoing Motion for Extension on the Appellants by placing a copy of same in the United States mail with sufficient postage attached thereto and addressed as follows:

Rick Faulks, Esq.  
Attorney for Appellants  
316 W. Cambridge Ave.  
Greenwood, SC 29646

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JUL 22 2021

**SC Court of Appeals**

  
Janelle Aukland

July 21, 2021  
Columbia, SC 29205

