

RECEIVED

Nov 23 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

The Honorable Jocelyn Newman, Circuit Court Judge

Case No.: 2018-CP-32-03103
Appellate Case No.: 2021-000658

R-Anell Housing Group, LLC, Respondent,

v.

Homemax, LLC, Appellant.

**MOTION FOR EXTENSION OF TIME FOR APPELLANT TO SERVE AND FILE
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED ON THE
RECORD ON APPEAL**

COMES NOW the Appellant, Homemax, LLC, and hereby requests a thirty (30) day extension of time to serve and file its Initial Brief and Designation of Matter, respectfully showing as follows:

1. That Appellant's Initial Brief and Designation of Matter are due on December 1, 2021, and that this is Appellant's third request for extension of time, but the second such request since the below signed entered his appearance in this matter.

2. That since the issuance of the Court's last extension in this matter, the below signed, and his family, were required to accommodate an unexpected school closure caused by COVID exposure and a subsequent period of isolation/quarantine mandated by the school. Upon information and belief, the scheduling difficulties caused by this, which are further compounded

by the intervening Thanksgiving Holiday, amount to good cause and warrant granting the instant extension.

3. Prior to making this motion, Appellant consulted with opposing counsel.

WHEREFORE Appellant respectfully requests that this Court issue an Order granting a thirty (30) day extension of time to file and serve its Initial Brief and Designation of Matter, making it due on December 31, 2021.

THURMOND KIRCHNER & TIMBES, P.A.



THOMAS J. RODE, Bar No. 77480
15 Middle Atlantic Wharf
Charleston, South Carolina 29401
Phone: 843-937-8000
Fax: 843-937-4200
Email: thomas@tktlawyers.com
Attorneys for Appellant

RECEIVED

Nov 23 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

The Honorable Jocelyn Newman, Circuit Court Judge

Common Pleas Court Case No. 2018-CP-32-03103
Appellate Case No. 2021-000658

R-Anell Housing Group, LLC, Respondent,

v.

Homemax, LLC, Appellant.

PROOF OF SERVICE

The undersigned certifies that she served a copy of the foregoing **Motion for Extension of Time for Appellant to Serve and File Initial Brief and Designation of Matter to be included on the Record on Appeal** to all counsel of record on November 23, 2021, by mailing a copy of same, electronically or with proper postage affixed thereto, as follows:

Robert P. Mangum, Esq.
James S. Murray, Esq.
Turner Padget Graham & Laney, P.A.
P.O. Box 1495
Augusta, GA 30903
rmangum@turnerpadget.com
jmurray@turnerpadget.com
Attorneys for Respondent

S. Cerone

Shannon R. Cerone, Paralegal