

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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DEC 10 2021

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Joseph M. Strickland, Master-in-Equity

Appellate Case No.: 2017-001795  
Civil Case No.: 2014-CP-40-01805

Country Properties, LLC, .....Respondent,

v.

Nancy Dunn Martin,.....Appellant.

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S  
INITIAL BRIEF AND DESIGNATION OF MATTER**

**BAXLEY, PRATT & WELLS, P.A.**  
John W. Wells, SC Bar 6019  
Attorney for the Respondent  
Three The Common at Lugoff  
Post Office Box 10  
Lugoff, South Carolina 29078  
(803) 438-4200 Office  
(803) 438-5090 Fax  
[jwells@baxleywells.com](mailto:jwells@baxleywells.com)

**BUNDY MCDONALD, LLC**  
M. Brent McDonald, SC Bar 78057  
Attorney for Respondent  
1516 Old Trolley Road, 2<sup>nd</sup> Floor  
Summerville, SC 29485  
(843) 492-0221 Office  
[brent@bundymcdonald.com](mailto:brent@bundymcdonald.com)

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF**

Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, Respondent, Country Properties, LLC, hereby moves for an Order of this Court granting a thirty-day extension to file Respondent's Initial Brief and Designation of Matter. Appellant's Initial Brief was filed on November 29, 2021, after the Appellant was granted two (2) thirty-day extensions.

Respondent requests a thirty-day extension of this deadline, based on the necessity of reviewing extensive records from 2016 trial of this case prior to drafting the brief. Counsel for Respondent has consulted with counsel for Appellate regarding this extension by phone and he consents to this motion. This will be Respondent's first extension for this deadline.

Respectfully submitted,

**BAXLEY, PRATT & WELLS, P.A.**

S/John W. Wells

John W. Wells, SC Bar 6019  
Attorney for the Respondent  
Three The Common at Lugoff  
Post Office Box 10  
Lugoff, South Carolina 29078  
(803) 438-4200 Office  
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**BUNDY MCDONALD, LLC**

S/M. Brent McDonald

M. Brent McDonald, SC Bar 78057  
Attorney for Respondent  
1516 Old Trolley Road, 2<sup>nd</sup> Floor  
Summerville, SC 29485  
(843) 492-0221 Office  
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v.

Nancy Dunn Martin, .....Appellant.

**PROOF OF SERVICE**

The undersigned certifies that she has served Respondent's Motion for Extension of Time to File Respondent's Initial Brief upon counsel for Appellant by attachment to AIS-registered email, pursuant to Order of the Supreme Court in re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (2021-08-25-02), on December 6, 2021, as follows:

Joey R. Floyd (68491) [jfloyd@brunerpowell.com](mailto:jfloyd@brunerpowell.com)  
Chelsea J. Clark (102211) [cclark@brunerpowell.com](mailto:cclark@brunerpowell.com)  
Wesley D. Peel (9283) [wpeel@brunerpowell.com](mailto:wpeel@brunerpowell.com)

  
\_\_\_\_\_  
Jessica Clyburn, Legal Secretary

Law Offices of  
**Baxley, Pratt & Wells, P.A.**

Charles B. Baxley  
John W. Wells  
Jessica L. Benson

Three The Common at Lugoff  
Post Office Box 10  
Lugoff, South Carolina 29078  
Telephone: (803) 438-4200  
Fax: (803) 438-5090

Rex K. Pratt  
(1929-1999)

December 6, 2021

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SC Court of Appeals

VIA US MAIL

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201


Re: Country Properties, LLC v. Nancy Dunn Martin  
Civil Action No.: 2014-CP-40-1805

Dear Madam Clerk:

Enclosed herewith you will find an original and six (6) copies of the Respondent's Motion for Extension of Time to file, Initial Brief and Designation of Matter and my firm's check in the amount of fifty and 00/100 (\$50.00) dollars to cover the applicable filing fee

Very Truly Yours,

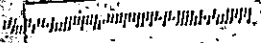
**BAXLEY, PRATT & WELLS, P.A.**

  
John W. Wells  
P.O. Box 10  
Lugoff, SC 29078  
(803) 438-4200  
Attorney for Appellant

JWW/jc

Enclosures

cc: Brent McDonald (by email)  
Joey R. Floyd (by email)  
Chelsea J. Clark (by email)  
Wesley D. Peel (by email)



Columbia, SC 29011  
MON 08 DEC 2021 PM

LAW OFFICES OF  
**BAXLEY, PRATT & WELLS, P.A.**  
3 THE COMMON AT LUGOFF  
P.O. Box 10  
Lugoff, S.C. 29078

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