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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

JAN 14 2022

SC Court of Appeals

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.

**SECOND 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

BUNDY MCDONALD, LLC
M. Brent McDonald, SC Bar 78057
Attorney for Respondent
1516 Old Trolley Road, 2nd Floor
Summerville, SC 29485
(843) 492-0221 Office
brent@bundymcdonald.com

SECOND 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 an additional 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 an additional 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. The Respondent requires additional time to respond to the five (5) issues raised by the Appellant in its forty-eight-page Initial Brief that was prepared over a ninety-day period from August 30, 2021, to November 29, 2021. Counsel for Respondent has consulted with counsel for Appellate regarding this extension by phone and he does not consent to this motion. This will be Respondent's second 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
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v.

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PROOF OF SERVICE

The undersigned certifies that she has served Respondent's Second 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 January 10 2022, as follows:

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



Jessica Clyburn, Legal Secretary

LAW OFFICES OF

BAXLEY, WELLS & BENSON, P.A.

JOHN W. WELLS
JESSICA L. BENSON

3 THE COMMON AT LUGOFF
Post Office Box 10
Lugoff, South Carolina 29078
Telephone: 803-438-4200
Fax: 803-438-5090

CHARLES B. BAXLEY,
OF COUNSEL
REX K. PRATT
(1929 – 1999)

January 10, 2022

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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

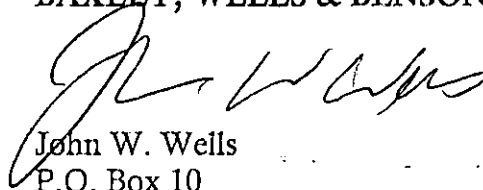
Re: Country Properties, LLC v. Nancy Dunn Martin
Civil Action No.: 2014-CP-40-1805

Dear Madam Clerk:

Enclosed herewith you will find an original and six (6) copies of the Respondent's Second 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, WELLS & BENSON, P.A.

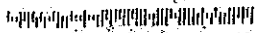


John W. Wells
P.O. Box 10
Lugoff, SC 29078
(803) 438-4200
Attorney for Appellant

JWW/jc

Enclosures

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



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