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Sep 12 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Master in Equity

Marvin H. Dukes, III, Master in Equity
Case No.: 2020-CP-07-01547

Appellate Case No. 2022-000301

Todd E. Taylor,.....Respondent,

v.

Amar and Kennie Gill Living Trust Dated March 15, 2019; Kennie Lee Miller Gill, Trustee of the Amar and Kennie Gill Living Trust Dated March 15, 2019; Kenneth V.L. Miller; and Anna M. Miller.....Appellants,

v.

South Beach Village Lagoon Villas, II, Horizontal Property Regime, LVII,
.....Respondent.

**SUPPLEMENT TO RESPONDENTS’ SECOND MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF and DESIGNATION OF MATTER**

As a supplement to the Respondents’ Motion for a 2 week extension of time to file Respondents’ Initial Briefs, filed by Respondents on September 9, 2022, a copy of which is attached hereto as **Exhibit A**, the undersigned is informed Appellants do not object to the relief requested in Respondents’ extension motion.

[SIGNATURES ON FOLLOWING PAGE]

***Supplement to Respondents' Second Motion for Extension of Time
to File Initial Brief and Designation of Matter
Appellate Case No. 2022-000301***

RESPECTFULLY SUBMITTED, this 12th day of September, 2022.

s/ Ed Kubec

Edward M. Kubec

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s/Lacey L. Houghton

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***Attorneys for Respondent South Beach
Village Lagoon Villas, II; Horizontal
Property Regime LVII***

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South Beach Village Lagoon Villas, II, Horizontal Property Regime, LVII,
.....Respondent.

PROOF OF SERVICE

I certify that I have served **Respondents' Supplement to Second Motion for Extension of Time to File Initial Brief and Designation of Matter**, upon the parties below by depositing a copy of it in the United States Mail, postage prepaid and/or via electronic mail, on September 12, 2022, addressed as follows:

Edward M. Kubec, Esq.
CoffeyKubec, LLP
1 Corpus Christie Place, Suite 105
Hilton Head Island, SC 29928
ekubec@coffeykubec.com
Counsel for Respondent Todd E. Taylor

Louis H. Lang, Esq.
Callison Tighe & Robinson, LLC
Post Office Box 1390
Columbia, South Carolina 29202
LouisLang@CallisonTighe.com
Counsel for Appellants

This 12th day of September, 2022.

COPELAND, STAIR, VALZ & LOVELL, LLP

By: s/Lacey L. Houghton
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Lagoon Villas, II; Horizontal Property Regime
LVII***

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v.

South Beach Village Lagoon Villas, II, Horizontal Property Regime, LVII,
.....Respondent.

**RESPONDENTS’ SECOND MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF and DESIGNATION OF MATTER**

COME NOW Respondents South Beach Village Lagoon Villas, II, Horizontal Property Regime, LVII, and Todd E. Taylor (hereinafter “Respondents”) by and through undersigned counsel, pursuant to Rule 263, SCACR, and respectfully request this Court grant Respondents a two (2) week extension in which to file their Initial Briefs and Designation of Matter.

Appellants filed their Initial Brief on July 15, 2022. Respondents’ Briefs were originally due on August 14, 2022. By Order dated August 9, 2022, this Court extended the time for Respondent South Beach Village Lagoon Villas, II, Horizontal Property Regime, LVII to file its

Initial Brief and Designation of Matter to September 13, 2022. By Order dated August 16, 2022, this Court extended the time for Respondent Taylor to file his Initial Brief and Designation of Matter to September 13, 2022.

Respondents respectfully request a two (2) week extension of time in which to file their Initial Briefs and Designation of Matter. Respondents request this short extension and respectfully submit an extension of time is appropriate in order to allow Respondents to fully respond to the arguments raised by Appellants. This Motion is not interposed for the purposes of unnecessarily delaying this Appeal. The position of Appellants regarding this Motion is unknown at the time of the filing of this Motion. As soon as the position of Appellants is ascertained, the undersigned will inform the Court.

Respondents respectfully request the time to file their Initial Briefs and Designation of Matter be extended to September 27, 2022.

RESPECTFULLY SUBMITTED, this 9th day of September, 2022.

s/ Ed Kubec
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South Beach Village Lagoon Villas, II, Horizontal Property Regime, LVII,
.....Respondent.

PROOF OF SERVICE

I certify that I have served **Respondents' Second Motion for Extension of Time to File Initial Brief and Designation of Matter**, upon the parties below by depositing a copy of it in the United States Mail, postage prepaid and/or via electronic mail, on September 9, 2022, addressed as follows:

Edward M. Kubec, Esq.
CoffeyKubec, LLP
1 Corpus Christie Place, Suite 105
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Counsel for Respondent Todd E. Taylor

Louis H. Lang, Esq.
Callison Tighe & Robinson, LLC
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Columbia, South Carolina 29202
LouisLang@CallisonTighe.com
Counsel for Appellants

This 9th day of September, 2022.

COPELAND, STAIR, VALZ & LOVELL, LLP

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Lagoon Villas, II; Horizontal Property Regime
LVII***

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REPLY TO SC OFFICE

September 9, 2022

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SC Court of Appeals

VIA EMAIL AND REGULAR MAIL

Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

Re: Todd E. Taylor v. Amar and Kennie Gill Living Trust Dated March 15, 2019, et al;
Appellate Court Case No.: 2020-CP-07-01547
Beaufort County Case No.: 2020-CP-07-01547
CSVL File No.: 4692-61574

Dear Ms. Kitchings:

Enclosed please find Respondents South Beach Village Lagoon Villas, II; Horizontal Property Regime LVII's and Todd E. Taylor's *Second Motion for Extension of Time to File Initial Brief and Designation of Matter* in this case, and related *Proof of Service*. The \$50.00 filing fee is also enclosed. By copy of this letter, the enclosed Motion and Proof of Service have been served on all counsel of record in this case *via electronic mail*. If anything further is required from Respondents at this time, please advise.

Sincerely,



DOUGLAS W. MACKELCAN
LACEY L. HOUGHTON

LLH:tjr

Enclosures

cc: via email only: Edward M. Kubec, Esq.; Louis H. Lang, Esq.
ekubec@coffeykubec.com; louislang@callisontighe.com