

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Oct 04 2022

SC 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. TaylorRespondent,

vs.

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,

vs.

South Beach Village Lagoon Villas, II,
Horizontal Property Regime LVIIRespondent.

APPELLANTS' MOTION FOR EXTENSION OF TIME
TO FILE APPELLANTS' INITIAL REPLY BRIEF

Appellants, 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, under Rule 263, SCACR, respectfully request an additional ten (10) day extension to submit Respondents' Initial Reply Brief, and any further Designation of Matter to be Included in the Record on Appeal, which are currently due October 7, 2022.

This motion is based on the following facts and argument.

Appellants' Initial Reply Brief and any further Designation of Matter are due to be filed September 7, 2022. Because of counsel's schedule, along with the weather emergency of Friday, September 30, 2022, counsel will be unable to thoroughly review Respondents' opening brief and draft and finalize a Reply and any further Designation of Matter by the present deadline for the filing of both.

If this extension is granted, Appellants' Initial Reply Brief and any further Designation of Matter will be due to be filed no later than **October 17, 2022**.

The undersigned is informed Respondents to not object to the relief sought by this Motion.

Accordingly, Appellants respectfully request the Court grant them a ten (10) day extension to file their Initial Reply Brief and any further Designation of Matter.

Respectfully submitted,

CALLISON TIGHE & ROBINSON, LLC

/s/ Louis H. Lang

Louis H. Lang, SC Bar # 3127

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October 4, 2022
Columbia, South Carolina

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PROOF OF SERVICE

I hereby certify that, on this date, the **Appellants' Motion for Extension of Time to File Appellants' Initial Reply Brief, and any further Designation of Matter to be Included in the Record on Appeal**, was served on Respondents' counsel via AIS email, pursuant to Supreme Court Order dated March 20, 2020, as amended on May 29, 2020, as follows:

Edward M. Kubec, Esq.
CoffeyKubec, LLP
18 Executive Park Road, Suite 3
Hilton Head Island, SC 29928
EKubec@CoffeyKubec.com

Counsel for Todd E. Taylor, Respondent

Douglas W. MacKelcan, Esq.
Lacey L. Loughton, Esq.
Copeland, Stair, Valz & Lovell, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401
DMacKelcan@CSVL.law
LHoughton@CSVL.law

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

A copy of the service email is attached hereto, as required.

I further certify that all parties required by Rule to be served have been served.

s/ Louis H. Lang
Louis H. Lang

October 4, 2022
Columbia, South Carolina

From: [Crystal Smith](#)
To: ekubec@coffeykubec.com; dmackelcan@csvl.law; lhoughton@csvl.law
Cc: [Louis Lang](#); [Crystal Smith](#)
Subject: 2022-000301 (Todd E. Taylor v. Amar and Kennie Gill Living Trust)
Date: Tuesday, October 4, 2022 2:12:16 PM
Attachments: [Motion for Extension \(Initial Reply Brief\).pdf](#)
[Clerk Court of Appeals.005 \(Filing Motion for Ext-Initial Reply Brief\).pdf](#)
[Motion for Extension \(Ini Bri\).Proof of Service.pdf](#)

Dear Counsel,

Attached please find our Motion for an Extension, Proof of Service, and letter to the appellate clerk regarding the above-referenced matter. The attached documents are being submitted today to the Court of Appeals for filing. Thank you.

With kind regards,

Crystal Smith



CRYSTAL C. SMITH LEGAL ASSISTANT

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LOUIS H. LANG - Member
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LouisLang@callisontighe.com

October 4, 2022

RECEIVED
Oct 04 2022
SC Court of Appeals

VIA EMAIL: ctappfilings@sccourts.org

Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Todd E. Taylor 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
Appellate Case No. 2022-000301
Our File No. 8828.001

Dear Ms. Kitchings:

Enclosed herewith please find the Appellants' Motion for Extension, together with the Proof of Service, in the above-referenced matter. Kindly file the same and return a clocked-in copy of each to the undersigned via return email.

The enclosed documents have been served upon Respondent's counsel today via email as indicated in the Proof of Service.

Please feel free to contact me with any questions. Thank you.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC

s/ Louis H. Lang

Louis H. Lang

LHL:ccs

Enclosures

cc: (w/ encls.) Edward M. Kubec, Esq.
(w/ encls.) Douglas W. MacKelcan, Esq.
(w/ encls.) Lacey L. Houghton, Esq.
Clerk.Court of Appeals.005