

RECEIVED
Oct 13 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Joe M. Crosby, Master-in-Equity

Case No. 2020-CP-22-0072

Appellate Case No. 2022-000545

MAC Coastal Properties, Inc., Appellant-Respondent,

vs.

Shoestring Retreat, LLC, Respondent-Appellant.

**MOTION FOR EXTENSION OF TIME
TO FILE PROOF OF SERVICE OF THE RECORD ON APPEAL**

Appellant-Respondent MAC Coastal Properties, Inc. (MAC) moves this court pursuant to Rule 263(b) SCACR for an extension of time to serve the record on appeal pursuant to Rule 210 SCACR which is due to be served by October 17, 2022. MAC's counsel requests this extension because at this time the record on appeal is more than 600 pages long, and contains numerous exhibits and counsel requires more time to complete the index for the voluminous record and to allow opposing counsel to review the record before its submission to the court. Additionally, MAC's counsel has emailed opposing counsel for clarification about some of the exhibits designated to be included in the record and is awaiting a response.

For all these reasons and for good cause shown, the undersigned requests an additional thirty (30) days to file the proof of service of the record on appeal which would make the filing

due on Wednesday, November 16, 2022. This is the first request for an extension for filing the record on appeal.

Respectfully Submitted,

TOBIAS G. WARD, JR. PA

s/ J. Derrick Jackson
Tobias G. Ward, SC Bar 5826
J. Derrick Jackson, SC Bar 15192
Post Office Box 50124
Columbia, South Carolina 29250
(803) 708-4200
tw@tobywardlaw.com
Attorneys for Appellant-Respondent

October 13, 2022

RECEIVED
Oct 13 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Joe M. Crosby, Master-in-Equity

Case No. 2020-CP-22-0072

Appellate Case No. 2022-000545

MAC Coastal Properties, Inc., Appellant-Respondent,

vs.

Shoestring Retreat, LLC, Respondent-Appellant.

PROOF OF SERVICE

The undersigned counsel for the Appellant-Respondent, MAC Coastal Properties, Inc. hereby certifies that on October 13, 2022, a copy of the Motion for Extension of Time to File Proof of Service of the Record on Appeal was served on Respondent-Appellant, Shoestring Retreat, LLC by emailing a copy of the same to Respondent Counsels' AIS Email address as shown on the attached email which is incorporated by reference.

TOBIAS G. WARD, JR. PA

s/ J. Derrick Jackson

J. Derrick Jackson, SC Bar 15192

Tobias G. Ward, SC Bar 5826

Attorneys for Appellant-Respondent

From: dj tobywardlaw.com
Sent: Thursday, October 13, 2022 4:43 PM
To: R. Bruce Wallace (bwallace@nexsenpruet.com); Shahid, Mary D.
Cc: Toby Ward
Subject: RE: MAC Coastal Properties, Inc. v. Shoestring Retreat, LLC // 2022-000545
Attachments: Motion for Extension Record on Appeal.pdf

Bruce and Mary,

Attached and served upon you as counsel for Respondent-Appellant Shoestring Retreat is Mac's Motion for an extension of time to serve the Record On Appeal.

Derrick

J. Derrick Jackson
Tobias G. Ward, Jr. PA
Post Office Box 50124
Columbia, SC 29250
(803) 708-4200 (Phone)
(803) 403-8754 (Fax)
dj@tobywardlaw.com

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail or phone (803) 708-4200 and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.