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Oct 21 2022

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM Horry COUNTY
Court of Common Pleas

Cynthia Graham Howe, Master-In-Equity

Appellate Case No. 2022-000134

Andrew Waldo; Jane Zheng; and SC Coast Properties, LLC d/b/a
Keller Williams Realty..... Petitioners,

v.

Michael Cousins; Founders Five, LLC d/b/a Sperry Van Ness Founders Group;
and South Carolina Association of REALTORS®..... Respondents,

Of Whom South Carolina Association of REALTORS® are..... Respondent.

**RESPONDENT SOUTH CAROLINA ASSOCIATION OF REALTORS®'
MOTION TO EXTEND TIME TO FILE BRIEF**

The Respondent South Carolina Association of REALTORS® (“SCAR”),
moves the Court for an Order granting a forty-day extension of time to file
Respondent’s Brief in the above-captioned case. The Brief of Respondent SCAR
is due on November 7, 2022. The grounds for this Motion are as follows:

1. Respondent seeks an extension to file and serve Respondent’s
Brief. Respondent’s counsel has numerous prior commitments and conflicts,
including medical procedures, trial, federal court deadlines, and vacations.

a. Mr. Manos is currently number three on the Richland County
trial roster for a two-day trial that is not expected to settle.

- b. Mr. Manos has surgery scheduled on October 27, 2022 which will require approximately two weeks for recovery.
- c. Mr. Manos has summary judgment briefing deadlines in Federal Court on October 28, 2022.
- d. Mr. Manos has vacation scheduled for the week of November 21, 2022.
- e. The above commitments leave little time to complete a response within the time-frame prescribed by the South Carolina Rules of Appellate Procedure.

2. Christopher R. Hampton, second chair on this matter, left Nexsen Pruet to begin his own practice in North Carolina several months ago. Bringing on new counsel to assist would also necessitate an extension of time to allow them to become educated regarding the issues and relevant law.

3. Petitioner's Brief was served by United States mail on October 7, 2022, Respondent's response is due November 7, 2022, with the extension, the proposed deadline is December 17, 2022.

4. Respondent, therefore, respectfully requests a forty-day extension of time in which to file and serve its response. By counsel's calculations, Respondent's response is currently due November 7, 2022. With the proposed extension, the new response due date would be Wednesday, December 17, 2022.

5. Counsel for Petitioners' reply would fall on December 27, 2022, in the midst of the holidays. Counsel for Petitioners and Respondent, therefore,

propose that Petitioners be granted an additional fifteen days in which to file and serve its reply. With the proposed extension, the new reply due date would be Wednesday, January 11, 2023.

6. Counsel for Respondent has consulted with counsel for Petitioners and counsel for Co-Respondent and counsel consents to this extension of time.

s/ Marcus Angelo Manos

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South Carolina Association of REALTORS®

October 21, 2022

Columbia, South Carolina