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Oct 20 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Fifteenth Judicial Circuit

The Honorable Michael G. Nettles,
Circuit Court Judge

APPELLATE CASE NO. 2022-0010355

Grand Strand Resort, III Homeowners Association, Inc., Respondent,

v.

PGP III, LLC, Philip “Phil” G. Pate, South Atlantic Bank, and United Community Bank,
Defendants.

Of whom PGP III, LLC and Philip “Phil” G. Pate are the Appellants.

**MOTION FOR EXTENSION OF TIME TO
FILE INITIAL BRIEF AND DESIGNATION OF MATTER OF APPELLANT**

Appellant respectfully requests a thirty (30) day extension of time to file the Initial Brief and Designation of Matter of Appellant for good cause shown. The Initial Brief and Designation of Matter of Appellant are due October 20, 2022 and if this request is granted, the Initial Brief and Designation of Matter of Appellant would be due on November 21, 2022. This is Appellant’s first request for an extension of time and this Motion is not intended for purposes of delay. The undersigned has requested the consent of Counsel for Respondent, however, no response to the request has been received as of this filing.

WHEREFORE, Appellants respectfully request that this Court grant Appellants an extension to time to file their Initial Brief and Designation in this Matter.

Respectfully submitted,

**BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.**

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*Attorneys for Appellants PGP III, LLC, and
Philip "Phil" G. Pate*

/s George W. Redman, III

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October 20, 2022

Other Counsel of Record:

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY

Court of Common Pleas
Fifteenth Judicial Circuit
The Honorable Michael G. Nettles, Circuit Court Judge

APPELLATE CASE NO. 001035

Grand Strand Resort III, Homeowners Association, Inc.,Respondent,

v.

PGP, LLC, and Philip "Phil" G. Pate, South Atlantic Bank, and
United Community Bank, Defendants,

Of whom PGP, LLC, and Philip "Phil" Pate are Appellants.

PROOF OF SERVICE

I, Rhiannon Boatwright, an employee of Bellamy Law Firm, Legal Assistant to George W. Redman, III certify that I served a copy of the attached Appellants' First Request Motion for Extension of Time to File Initial Brief.

Respectfully submitted,

**BELLAMY, RUTENBERG, COPELAND,
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October 20, 2022

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October 20, 2022

VIA FEDERAL EXPRESS

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: APPELLANTS' FILING FEE FOR MOTION FOR EXTENSION OF TIME
Grand Strand Resort, III Homeowners Association, Inc. v. PGP, III, LLC, Phil G.
Pate
Of whom PGP, III, LLC, and Philip "Phil" G. Pate are Appellants
Case Number: 2022-0010355

Dear Ms. Kitchings:

Please find enclosed check number 86846 in the amount of \$50.00 for the filing fee for Appellants' Motion for Extension regarding the above-referenced matter. The Motion for Extension was filed on October 20, 2022. Should you have any questions or need anything further, please do not hesitate to contact our office.

Respectfully submitted,

**BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.**

George W. Redman, III

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