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Nov 23 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

R. Ferrell Cothran, Jr. , Circuit Court Judge

Appellate Case No. 2022-001587

315 Corley CW LLC; 368 Mount Pelia LLC; Bridge Charleston Investments B LLC; Bridge Charleston Investments C LLC; Bridge Charleston Investments E LLC; Bridge Charleston Investments H LLC; Anne Bosler and Dylan Hart as Trustees of the Bosler-Hart Trust; Geoffrey J. Block; R. Jeffrey Kimball and Deborah S. Kimball; Sebrina Leigh-Jones and Chris Leigh-Jones; Jennifer Albero; Live Oak Assets LLC; Matthew N. Lynch and Barbara A. Lynch; MKM 22 West LLC; One Rumford Lane LLC; Salt Works LLC; and TTJR LLC; individually, derivatively, and as class representatives, as set forth herein,Respondents,

v.

Palmetto Bluff Development, LLC; Palmetto Bluff Club, LLC; Palmetto Bluff Real Estate Company, LLC; PBLH, LLC; Montage Palmetto Bluff, LLC; Palmetto Bluff Preservation Trust, Inc.; Palmetto Bluff Preservation Trust Board of Stewards: Jordan Phillips; Mark Polites; Gray Ferguson; Henry Armistead; South Street Partners LLC; John Does 1-25, Appellants.

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

Appellants Palmetto Bluff Development, LLC; Palmetto Bluff Club, LLC;
Palmetto Bluff Real Estate Company, LLC; PBLH, LLC; Montage Palmetto Bluff, LLC;
Palmetto Bluff Preservation Trust, Inc.; Palmetto Bluff Preservation Trust Board of

Stewards: Jordan Phillips; Mark Polites; Gray Ferguson; Henry Armistead; South Street Partners LLC, pursuant to Rule 240, SCACR, respectfully moves for a 30-day extension of time in which to file their initial brief and designation of matter to the record on appeal. In support of this motion, Appellants would show as follows:

1. Appellants filed and served their Notice of Appeal on November 11, 2022. There is no transcript for this appeal. Accordingly, pursuant to Rule 208(a)(2), SCACR, Appellants' initial brief and designation of matter are due on or before December 12, 2022.

2. An extension of this deadline is needed to give counsel sufficient time to prepare Appellants' opening brief and designation of matter, due to the holiday season and in order to accommodate deadlines in other matters. Undersigned counsel certifies that this extension is sought in good faith and not for purposes of delay.

3. Appellants request an extension of 30 days, which would result in a new deadline of January 11, 2023.

November 23, 2022

Respectfully submitted,

s/Val H. Stieglitz

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v.

Palmetto Bluff Development, LLC; Palmetto Bluff Club, LLC; Palmetto Bluff Real Estate Company, LLC; PBLH, LLC; Montage Palmetto Bluff, LLC; Palmetto Bluff Preservation Trust, Inc.; Palmetto Bluff Preservation Trust Board of Stewards: Jordan Phillips; Mark Polites; Gray Ferguson; Henry Armistead; South Street Partners LLC; John Does 1-25, Appellants.

PROOF OF SERVICE

I certify that I have served the foregoing Motion for Extension of Time to File Appellants’ Initial Brief and Designation of Matter on Respondents 315 Corley CW LLC; 368 Mount Pelia LLC; Bridge Charleston Investments B LLC; Bridge Charleston Investments C LLC; Bridge Charleston Investments E LLC; Bridge Charleston

Investments H LLC; Anne Bosler and Dylan Hart as Trustees of the Bosler-Hart Trust; Geoffrey J. Block; R. Jeffrey Kimball and Deborah S. Kimball; Sebrina Leigh-Jones and Chris Leigh-Jones; Jennifer Albero; Live Oak Assets LLC; Matthew N. Lynch and Barbara A. Lynch; MKM 22 West LLC; One Rumford Lane LLC; Salt Works LLC; and TTJR LLC by emailing a copy of the same to the following counsel of record for Respondents using the primary email address listed in the Attorney Information System.

Ian S. Ford, Ian.Ford@FordWallace.com

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Hunter H. James, Hunter.James@FordWallace.com

November 23, 2022

s/ Kirsten E. Small

Kirsten E. Small, SC Bar No. 75681