

**RECEIVED**  
**Dec 30 2022**  
**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

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Appellate Case No. 22-001453  
Case No. 2020-CP-37-00765

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The Estate of David Greene.....Appellant,

v.

MT Investments, LLC, Lakewood Capital Group, LLC,  
Marina Bay Property Owners Association, Inc., and  
John Doe(s), Members of MT Investments, LLC.....Defendants,

Of Whom

MT Investments, LLC, Lakewood Capital Group, LLC,  
and John Doe(s), Members of MT Investments, LLC are.....Respondents,

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**MOTION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL**

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Because of conflicts in Respondent’s counsel’s schedule, Respondents, with the consent of Appellant, respectfully requests an additional extension of time of 30 days to file their Initial Brief and Designation of Matters for the Record on Appeal until February 2, 2023. The current extended deadline is January 3, 2023. This is Respondents’ second request for an extension.

WHEREFORE, Respondents respectfully request that the relief prayed for herein be granted.

December 30, 2022

BURR & FORMAN, LLP

s/Bernie W. Ellis

Bernie W. Ellis (SC Bar No. 64841)

Post Office Box 447

Greenville, South Carolina 29602

(864) 271-4940

Attorney for Respondents

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Of Whom

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\_\_\_\_\_  
**CERTIFICATE OF SERVICE**  
\_\_\_\_\_

I certify that a copy of the foregoing **Respondent’s Consent Motion for Extension of Time** has been served on the following on December 30, 2022, by emailing and placing the same in United States mail, postage prepaid, addressed as follows:

Bryan De Bruin, Esq.  
Charlotte D. Hickman, Esq.  
DE BRUIN LAW FIRM, LLC  
16 Wellington Avenue  
Greenville, SC 29609  
[bdebruin@debruinlawfirm.com](mailto:bdebruin@debruinlawfirm.com)

December 30, 2022

BURR & FORMAN, LLP

s/Bernie W. Ellis

Bernie W. Ellis (SC Bar No. 64841)

Post Office Box 447

Greenville, South Carolina 29602

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Attorney for Respondents

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171 17th Street, NW  
Suite 1100  
Atlanta, GA 30363

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December 30, 2022

The Honorable Jenny A. Kitchings ([ctapp@sccourts.org](mailto:ctapp@sccourts.org)) and US Mail (check only)  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
**Dec 30 2022**  
**SC Court of Appeals**

**Re: The Estate of David Greene v. MT Investments, LLC, et al.**  
**Case No. 2020-CP-37-07675**  
**Appellate Case No. 22-001453**

Dear Ms. Kitchings:

Enclosed please find for filing Appellant's Consent Motion for Extension of Time to file the Initial Brief and Designation of Matter for the Record on Appeal, I have also enclosed a check in the amount of \$50.00 for the filing fee.

With kind regards, I am

Very truly yours,



Bernie W. Ellis

BWE

cc: Bryan DeBruin, Esq.  
Charlotte D. Hickman, Esq.