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Dec 28 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge
Trial Court Case No. 2020-CP-26-06420

Appellate Case No. 2022-001035

Grand Strand Resort III Homeowners Association, Inc. Plaintiff

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 Appellants,

v.

Grand Strand Resort III Homeowners Association, Inc. Respondent.

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

Respondent respectfully requests a thirty (30) day extension of time to file the Initial Brief and Designation of Matter of Respondent for good cause shown. The Initial Brief and Designation of Matter of Respondent are due January 21, 2023 and if this request is granted, the Initial Brief and Designation of Matter of Respondent would be due on February 21, 2023. This is Respondent's first request for an extension of time and this Motion is not intended for purposes of delay. In fact, Respondent Counsel represents to the Court that the primary basis for requesting

the extension of time is that Respondent Counsel's wife is scheduled to be undergoing extensive treatments for cancer and related issues during the month of January. Counsel for Appellants has consented to the relief requested by this Motion.

WHEREFORE, Respondent respectfully requests that this Court grant Respondent an extension of time to file its Initial Brier and Designation in this Matter.

Respectfully submitted,

DESCHAMPS LAW FIRM

/s/ William W. DesChamps, Jr.
William W. DesChamps, Jr., SC Bar #1658
*Attorney for Respondent Grand Strand
Resort III Homeowners Association, Inc.*
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December 27, 2022

Other Counsel of Record:

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v.

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of whom

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

v.

Grand Strand Resort III Homeowners Association, Inc. Respondent.

PROOF OF SERVICE

I, Debra-Jo Rozek, an employee of DesChamps Law Firm, Legal Assistant to William W. DesChamps, Jr., Esq., certify that I served a copy of the attached Respondent's First Request Motion for Extension of Time to File Initial Brief upon all counsel of record.

Respectfully submitted,

DESCHAMPS LAW FIRM

A handwritten signature in cursive script, appearing to read "Debra-Jo Røzek", is written over a horizontal line.

Debra-Jo Røzek

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(843) 448-2391

Deschamps12@sc.twcbc.com

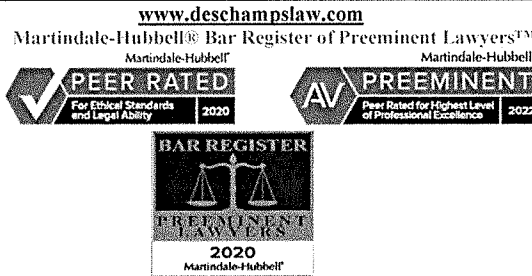
Legal Assistant to William W. DesChamps, Jr., Esq.

December 27, 2022

DESCHAMPS LAW FIRM*

ATTORNEYS-AT-LAW

WILLIAM W. DESCHAMPS, JR., ESQ.#^
WILLIAM W. DESCHAMPS, III, ESQ.#
PEGGY G. DESCHAMPS, OFFICE ADMINISTRATOR
CERTIFIED CIRCUIT COURT MEDIATOR
^ CERTIFIED CIRCUIT COURT ARBITRATOR



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December 27, 2022

VIA UPS OVERNIGHT DELIVERY

Tracking No.: 1Z F66 059 01 2433 3384

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

RE: *Grand Strand Resort III Homeowners Association, Inc. v. PGP III, LLC, Philip "Phil" G. Pate, et al. of Whom PGP III, LLC and Philip "Phil" G. Pate are Appellants and Grand Strand Resort III Homeowners Association, Inc. is Respondent*
Case No.: 2022-00010355
DLF File No.: L20-002

Dear Ms. Kitchings:

Please find enclosed our firm's Check No. 10913 in the amount of \$50.00 for the filing fee for Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter regarding the above referenced matter. The Motion for Extension was filed on December 27, 2022. Should you have any questions or need anything further, please do not hesitate to contact our office.

Respectfully submitted,

DESCHAMPS LAW FIRM


William W. DesChamps, Jr.

WWD:dr
Enclosure

