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Jan 23 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
The Honorable Donald B. Hocker, Circuit Court Judge
Beaufort County
Trial Court Case No. 2020-CP-07-1064

APPELLATE CASE NO. 2022-001547

Turner's Marina LLC,

Respondent-Appellant,

vs.

Paige Lorberbaum, Jeffrey Klapper, and Diane L. Klapper,

Defendants,

Of whom Paige Lorberbaum is the Appellant-Respondent and Jeffrey A. Klapper and Diane L. Klapper are Respondents.

**MOTION FOR STAY IN PERFECTING APPEAL OR FOR EXTENSION OF
TIME TO FILE RESPONDENT-APPELLANT'S INITIAL RESPONSIVE BRIEF**

The Respondent-Appellant Turner's Marina LLC has this date filed a Motion to Dismiss the appeal of Appellant-Respondent Paige Lorberbaum as moot. Because the Court's resolution of that Motion may obviate the need for the Respondent-Appellant Turner's Marina LLC to file an Initial Responsive Brief and Designation of Matter, Turner's Marina LLC hereby moves this Court to stay further steps toward perfection of the appeal until the Court has issued a dispositive Order on the Motion to Dismiss.

Alternatively, pursuant to Rule 240, SCACR, Respondent-Appellant Turner's Marina LLC requests a thirty (30) day extension of the deadline for filing and serving its Initial Responsive Brief and Designation of Matter to be included in the Record on Appeal in this case. The current deadline is January 27, 2023. The requested extended deadline would be February 26, 2023.

This is the second request for an extension of this deadline. Counsel for Appellant-Respondent Lorberbaum does not consent to this Motion. Counsel for Respondents Jeffrey A. Klapper and Diane L. Klapper does not object to the Motion.

I SO MOVE.

s/Thomas C. Taylor

Thomas C. Taylor, Esq.

LAW OFFICE OF THOMAS C. TAYLOR, LLC.

Post Office Box 1808

Bluffton, South Carolina 29910-1808

South Carolina Bar Number: 5499

Telephone: 843-785-5050

Facsimile: 843-738-4502

Email: tom@thomastaylorlaw.com

**ATTORNEY FOR RESPONDENT-APPELLANT
TURNER'S MARINA LLC**

Bluffton, South Carolina
January 23, 2023

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PROOF OF SERVICE

I hereby certify that this law firm represents the Respondent-Appellant Turner's Marina LLC in the above-captioned matter and that on the date below, in Bluffton, South Carolina, I served a copy of the forgoing on the following persons via electronic mail to their AIS E-mail address:

Documents Served:

**MOTION FOR STAY IN PERFECTING APPEAL OR
FOR EXTENSION OF TIME TO FILE RESPONDENT-
APPELLANT'S INITIAL RESPONSIVE BRIEF**

Parties Served:

**Russell P. Patterson, Esq.
Russell P. Patterson, P.A.
SC Bar No.: 4375
Post Office Box 8047
Hilton Head Island, SC 29938
russell@russellpattersonlaw.com
ATTORNEY FOR APPELLANT-RESPONDENT
PAIGE N. LORBERBAUM**

**James S. Murray, Esq.
Turner Padget Graham & Laney, PA
Post Office Box 1495
Augusta, GA 30903-1495
JMurray@TurnerPadget.com
ATTORNEY FOR RESPONDENTS
JEFFREY A. KLAPPER AND DIANE L. KLAPPER**



s/Thomas C. Taylor

Thomas C. Taylor, Esq.
LAW OFFICE OF THOMAS C. TAYLOR, LLC.
Post Office Box 1808
Bluffton, South Carolina 29910
South Carolina Bar Number: 5499
Telephone: 843-785-5050
Facsimile: 843-738-4502
Email: tom@thomastaylorlaw.com

**ATTORNEY FOR RESPONDENT-APPELLANT
TURNER'S MARINA LLC**

Bluffton, South Carolina
January 23, 2023

LAW OFFICE OF
THOMAS C. TAYLOR, LLC

ADMITTED TO THE UNITED STATES
SUPREME COURT BAR

ADMITTED IN SOUTH CAROLINA,
COLORADO AND GEORGIA

CERTIFIED SC CIRCUIT
COURT MEDIATOR

10 PINCKNEY COLONY ROAD
BUILDING 400
BLUFFTON, SC 29909

TELEPHONE 843-785-5050
TELECOPIER 843-738-4502

www.thomastaylorlaw.com • tom@thomastaylorlaw.com

MAILING ADDRESS
P.O. BOX 1808
BLUFFTON, SC
29910-1808

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SC Court of Appeals

Via E-Mail Attachment: ctappfilings@sccourts.org

Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

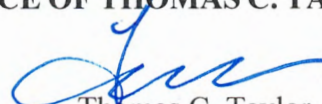
Re: Motion For Stay In Perfecting Appeal Or For Extension Of Time To File Respondent-Appellant's Initial Responsive Brief in Turner's Marina LLC, Respondent-Appellant vs. Paige Lorberbaum, Jeffrey Klapper, and Diane L. Klapper, Defendants, Of whom Paige Lorberbaum is the Appellant-Respondent and Jeffrey A. Klapper and Diane L. Klapper are Respondents; Case No. 2022-001547

Dear Clerk Kitchings:

I represent the Respondent-Appellant Turner's Marina LLC in this matter. I am attaching hereto the Respondent-Appellant Turner's Marina LLC's Motion For Stay In Perfecting Appeal Or For Extension Of Time To File Respondent-Appellant's Initial Responsive Brief, which I ask you to please file. I also attach a Proof of Service. I am sending a \$50.00 check as the filing fee in the U.S. Mail today.

Thank you. Please contact me at your convenience if you have any questions or need further information.

Yours very truly,
LAW OFFICE OF THOMAS C. TAYLOR, LLC


Thomas C. Taylor

TCT/dpt
Attachments

cc: Russell P. Patterson, Esq., and James S. Murray, Esq., via email transmittal
Neil Turner, via e-mail transmittal