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**Jan 27 2023**

**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 (SECOND) FOR EXTENSION OF TIME TO FILE INITIAL  
BRIEF AND DESIGNATION OF MATTER OF RESPONDENT

Respondent respectfully requests a second 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 February 21, 2023 and if this second request is granted, the Initial Brief and Designation of Matter of Respondent would be due on March 23, 2023. This is Respondent's second 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 the scheduling by Duke Cancer Center of advanced cancer treatments and surgery for Respondent Counsel's wife. Dr. Carol Bogdan is the local oncologist, Dr. Gretchen Kimmick is the Duke oncologist, and Dr. Peter Feci is the Duke neurosurgeon.

Counsel for Appellant has consented to the relief requested by this Motion.

**WHEREFORE**, Respondent respectfully requests that this Court grant Respondent a second extension of time to file its Initial Brief 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.*  
1357 21<sup>st</sup> Avenue North, Suite 102  
Myrtle Beach, South Carolina 29577  
(843) 448-2391  
[wwd@deschampsllaw.com](mailto:wwd@deschampsllaw.com)

January 27, 2023

Other Counsel of Record:

George W. Redman, III, Esq.  
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*Attorney for PGP III, LLC and Philip "Phil" G. Pate*

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*Attorneys for United Community Bank*

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of whom

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

v.

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

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PROOF OF SERVICE

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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 Second Request Motion for Extension of Time to File Initial Brief upon all counsel of record.

Respectfully submitted,

DESCHAMPS LAW FIRM

A handwritten signature in black ink, appearing to read "Debra-Jo Rozek", written over a horizontal line.

Debra-Jo Rozek  
1357 21<sup>st</sup> Avenue North, Suite 102  
Myrtle Beach, South Carolina 29577  
(843) 448-2391  
[Deschamps12@sc.twcbc.com](mailto:Deschamps12@sc.twcbc.com)  
Legal Assistant to William W. DesChamps, Jr., Esq.

January 27, 2023

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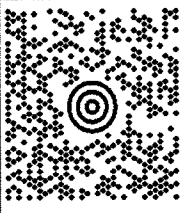

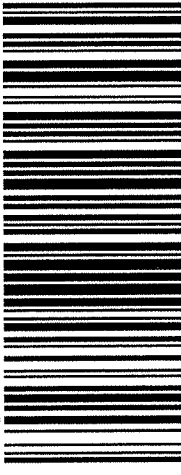

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# DESCHAMPS LAW FIRM\*

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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**SC Court of Appeals**

**VIA UPS OVERNIGHT DELIVERY**

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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. 10931 in the amount of \$50.00 for the filing fee for Respondent's Motion (Second) for Extension of Time to File Initial Brief and Designation of Matter regarding the above referenced matter. The Motion for Extension was filed on January 27, 2023. 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