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Mar 16 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 EXTENSION OF TIME TO FILE RESPONDENT-APPELLANT'S
INITIAL RESPONSIVE BRIEF**

The Respondent-Appellant Turner's Marina LLC pursuant to Rule 240, SCACR, 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. Because of the denial of the Respondent-Appellant's Motion To Dismiss, the current deadline is unknown. The requested extended deadline would be April 16, 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.
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**ATTORNEY FOR RESPONDENT-APPELLANT
TURNER'S MARINA LLC**

Bluffton, South Carolina
March 16, 2023

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Defendants,

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

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 EXTENSION OF TIME TO FILE
RESPONDENT-APPELLANT'S INITIAL
RESPONSIVE BRIEF**

Parties Served:

**Russell P. Patterson, Esq.
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ATTORNEY FOR APPELLANT-RESPONDENT
PAIGE N. LORBERBAUM**

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ATTORNEY FOR RESPONDENTS
JEFFREY A. KLAPPER AND DIANE L. KLAPPER**

s/Thomas C. Taylor



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

Bluffton, South Carolina
March 16, 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

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BLUFFTON, SC
29910-1808

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SC Court of Appeals

March 16, 2023

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 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 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