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**May 05 2023**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA**  
In the Court of Appeals

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**APPEAL FROM HORRY COUNTY**  
Court of Common Pleas  
Fifteenth Judicial Circuit

The Honorable Michael G. Nettles,  
Circuit Court Judge

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**APPELLATE CASE NO. 2022-001035**

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

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 are the Appellants.

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**MOTION FOR EXTENSION OF TIME TO  
RESPOND TO MOTION TO STRIKE**

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Appellant respectfully requests a thirty (30) day extension of time to file the Response to the Motion to Strike which is due May 11, 2023. If this request is granted, the Response to the Motion to Strike would be due on June 10, 2023. This is Appellant's first request for an extension of time and this Motion is not intended for purposes of delay and is requested on the grounds that the Parties are earnestly pursuing settlement. Counsel for Respondent has consented to the relief requested by this Motion.

**WHEREFORE**, Appellants respectfully request that this Court grant Appellants an extension to time to file their Response to the Motion to Strike in this Matter.

Respectfully submitted,

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/s George W. Redman, III

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May 5, 2023

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May 5, 2023

VIA FEDEX and EMAIL (*ctappfilings@sccourts.org*)

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

**RE: GRAND STRAND RESORT III V. PGP III, LLC**  
Appellate Case No. 2022-001035  
Motion for Extension of Time

Dear Ms. Kitchings:

Enclosed please find Appellant's Motion for Extension of Time to Respond to Motion to Strike for consideration. I have also enclosed my law firm's check, numbered 88304, in the amount of \$50.00 as payment of the Motion filing fee. Please be advised that counsel for the Respondent has consented to the relief requested by this Motion.

Should you have any questions, please feel free to contact my office. We look forward to hearing from you soon.

Thank you for your kind consideration,

**BELLAMY, RUTENBERG, COPELAND,  
EPPS, GRAVELY & BOWERS, P.A.**

George W. Redman, III

GWR/lm

Enclosures: as noted

cc: William W. DesChamps, Jr., Esquire (*via email transmission*)  
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