

**RECEIVED**  
**May 09 2023**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

---

Case No. 2022-CP-26-01323

---

HSS BAREFOOT, LLC d/b/a CENTURY 21 BAREFOOT,  
R&G CORP d/b/a CENTURY 21 THE HARRELSON GROUP,  
KEVIN MILLS, MILLS, LLC, and GREG HARRELSON, .....Respondents,  
JOEL D. BARBER, .....Appellant.

---

**APPELLANT’S MOTION FOR EXTENSION OF TIME  
TO FILE REPLY TO RETURN TO PETITION FOR A WRIT OF SUPERSEDEAS**

---

Pursuant to Rules 240 and 263, SCACR, the Appellant Joel D. Barber (“Appellant”), through counsel, hereby moves for a five (5) day extension of time to file his Reply to Appellee’s Return to the Petition for a Writ of Supersedeas, through and including May 17, 2023.

Appellant’s Reply is currently due on May 12, 2023, and therefore the original time to act has not yet expired. This is Appellant’s first request for an extension of time to file the Reply.

The grounds for this motion are that the undersigned needs additional time to confer with his client regarding the Return and to prepare the Reply. The undersigned also has other obligations and commitments in both the underlying matter pending before the trial court below and in other matters which create a need for additional time to prepare the Reply. Furthermore, an extension of

time for five (5) days will not result in any undue prejudice to Respondents, and will not unduly delay the matter.

Finally, counsel for Respondents has stated via email exchange with the undersigned that Respondents consent to a five (5) day extension of time through May 17, 2023.

WHEREFORE, based on the foregoing, and for good cause shown, Appellant respectfully requests a five (5) day extension of time to serve and file his Reply to the Return to the Petition for a Writ of Supersedeas, through and including May 17, 2023, and for such other relief as justice requires.

This the 9<sup>th</sup> day of May, 2023.

*/s/ Christian H. Staples*

Christian H. Staples

SC Bar No. 101470

Abigail Y. Bechtol

SC Bar No. 102414

**SHUMAKER, LOOP & KENDRICK, LLP**

101 South Tryon Street, Suite 2200

Charlotte, NC 28280

Telephone: 704-375-0057

Facsimile: 704-332-1197

[cstaples@shumaker.com](mailto:cstaples@shumaker.com)

[abechtol@shumaker.com](mailto:abechtol@shumaker.com)

*Attorneys for Appellant*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing **APPELLANT'S MOTION FOR EXTENSION OF TIME TO FILE REPLY TO RETURN TO PETITION FOR A WRIT OF SUPERSEDEAS** was served on all counsel of record via email addressed as follows:

Amanda A. Bailey  
Taylor K. Voegel  
BURR & FORMAN LLP  
P.O. Box 336  
Myrtle Beach, SC 29578-0336  
[abailey@burr.com](mailto:abailey@burr.com)  
[tvoegel@burr.com](mailto:tvoegel@burr.com)  
*Attorneys for Respondents*

**RECEIVED**  
**May 09 2023**  
**SC Court of Appeals**

This the 9<sup>th</sup> day of May, 2023.

*/s/ Christian H. Staples*

---

Christian H. Staples  
SC Bar No. 101470  
**SHUMAKER, LOOP & KENDRICK, LLP**  
*Attorneys for Appellant*

Christian H. Staples  
(704) 945-2183 (Direct)  
[cstaples@shumaker.com](mailto:cstaples@shumaker.com)

May 9, 2023

**RECEIVED**  
**May 09 2023**  
**SC Court of Appeals**

Via Federal Express

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

Re: *HSS Barefoot, LLC, et al. v. Joel D. Barber, et al.*  
Horry County Circuit Court Case No.: 2022CP2601323  
Appellate Case No.: 2023-192

Dear Ms. Kitchings:

Enclosed for filing in connection with the above-referenced matter, please find a check for \$50.00 for the filing fee associated with *Appellant's Motion for Extension of Time to File Reply to Return to Petition for a Writ of Supersedeas*, which motion was submitted for electronic filing on the above date.

ctappThank you for your time and attention to this matter.

Sincerely,



Christian Staples

Enclosure

cc: Amanda Bailey, Esq. (via email only to [ABailey@burr.com](mailto:ABailey@burr.com))  
Taylor K. Voegel (via email only to [TVoegel@burr.com](mailto:TVoegel@burr.com))