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Jun 09 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Fifteenth Judicial Circuit

The Honorable Michael G. Nettles,
Circuit Court Judge

APPELLATE CASE NO. 2022-001035

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.

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

Appellant respectfully requests a second thirty (30) day extension of time to file the Response to the Motion to Strike, which was initially due May 11, 2023 and thereafter extended to June 12, 2023. If this request is granted, the Response to the Motion to Strike would be due on July 12, 2023. The grounds for this Motion are that Appellants just received Respondents’ first written settlement offer yesterday, being the afternoon of June 7, 2023, but have not yet received Respondents’ itemization, calculations, or explanation as to said initial offer. Counsel for Respondent has consented in writing 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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Phyllip "Phil" G. Pate*

/s George W. Redman, III

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June 7, 2023

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June 8, 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 88531, 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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