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Jul 10 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.

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

Appellant respectfully requests a third (3rd) thirty (30) day extension of time to file a Response to Respondent’s Motion to Strike. The deadline for said responsive filing was previously extended to July 12, 2023, on the grounds that the Parties have entered into substantive settlement negotiations. This Motion is based upon the grounds for that the Parties, having exchanged their written settlement proposals, now desire to continue their negotiations by and through have this matter submitted to Mediation, which is now scheduled to take place on July 25, 2023, with Mr. John M. Leiter, Esquire, serving as mediator. Counsel for Respondent has consented to the relief requested by this Motion. If this request is granted, the Appellants’ Response to the Motion to Strike would be due on August 11, 2023.

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,

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

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*Attorneys for Appellants PGP III, LLC, and
Phyllip "Phil" G. Pate*

/s George W. Redman, III

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July 10, 2023

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July 10, 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

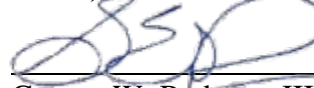
Dear Ms. Kitchings:

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 88714 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*)
Client

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