

July 25, 2023

RECEIVED
Jul 25 2023
SC Court of Appeals

Via E-Mail

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

RE: Dolphin Point Owners' Association, Inc. v Seabrook Island Property Owners
Association
Appellate Case No. 2023-001158
NMRS File No.: 048541.09009

Dear Ms. Kitchings:

Appellant Seabrook Island Property Owners Association served and filed its Notice of Appeal on July 19, 2023. Appellant received the last completed transcript in this matter on or about March 10, 2023. Accordingly, pursuant to Rule 208(a)(1), Appellant's initial brief and designation of matter are currently due Friday, August 18, 2023.

Appellant respectfully requests a thirty-day extension of time to file their initial brief and designation of matter. This is the first extension request for these filings. Counsel for Respondent consents to this extension request (Ex A). With the extension, Appellant's initial brief and designation of matter will be due September 18, 2023¹.

Our check in the amount of \$50.00 is being hand-delivered to the Court. Thank you for your consideration of this extension request.

Very truly yours,

s/Shawn Willis

¹ The 30th day falls on Sunday, September 17th.

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Shawn R. Willis

SW:mws

cc:
Trenholm Walker, Esquire – (via email)

EXHIBIT A

Email re. extension consent

Meredith Keane

From: Trenholm Walker <walker@wglfirm.com>
Sent: Tuesday, July 11, 2023 2:56 PM
To: Shawn Willis
Subject: RE: Dolphin Point / SIPOA

External Source/Sender notice

Use caution responding or clicking links/attachments.

Shawn'

Sorry I missed you when you called.

Yes, I was talking about the lien. We aren't going to pursue execution but we do want our lien to remain in place.

I have the transcript too. I am fine with your taking an extension, and even a second one. I am delighted to learn you have a good trip planned. I have plans in late October and will be making the same request.

Trenholm

From: Shawn Willis <shawn.willis@nelsonmullins.com>
Sent: Tuesday, July 11, 2023 9:28 AM
To: Trenholm Walker <walker@wglfirm.com>
Subject: RE: Dolphin Point / SIPOA

Thank you, Trenholm. I just tried to give you a call to touch base.

To clarify, do you mean the release of the lien of the judgment on the real estate?

Also, it looks like the trial transcript has already been ordered and received by Robbie's firm. Can you confirm that you have received it as well? If we don't need to order a new transcript, my initial brief and designation would be due at the latest on August 21. Do you see a need for me to order a new transcript? From a timing standpoint, my wife and I have a long standing trip planned to take our four kids (3, 6, 9 and 10) to Disney World the first week in August, and I also have a relatively complex development deal closing August 18 that will consume most of that week. Would you be willing to consent to a request from me to the court of appeals asking for a 30 day extension for my initial brief and designation?

Shawn

Shawn R. Willis
843.534.4230 (office)
803.260.3908 (mobile)
shawn.willis@nelsonmullins.com



From: Trenholm Walker <walker@wglfirm.com>
Sent: Tuesday, July 11, 2023 9:01 AM
To: Shawn Willis <shawn.willis@nelsonmullins.com>
Subject: FW: Dolphin Point / SIPOA

Hi, Shawn,

I will look over the draft order and get back to you.

I don't know of any authority that requires the plaintiff to release the judgment and substitute the money deposited with the clerk. If you have some, I would like to review it.

Thanks,

Trenholm

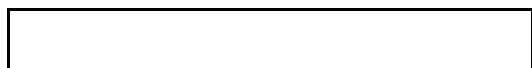
From: Shawn Willis <shawn.willis@nelsonmullins.com>
Sent: Monday, July 10, 2023 10:08 AM
To: Trenholm Walker <walker@wglfirm.com>
Subject: RE: Dolphin Point / SIPOA

Good morning, Trenholm. Attached for your review is a proposed consent order for the judgment deposit, which stays execution and stops further accrual of post-judgment interest. For completeness, I have also added in that the lien of the judgment against SIPOA's real property will be released. Please let me know if you have any comments and whether you will consent. I have next Friday, July 21 on my calendar for the notice of appeal and I will get it out by then.

If you have any questions, please give me a call.

Thanks,
Shawn

Shawn R. Willis
843.534.4230 (office)
803.260.3908 (mobile)
shawn.willis@nelsonmullins.com



From: Trenholm Walker <walker@wglfirm.com>
Sent: Thursday, May 25, 2023 3:17 PM

To: Shawn Willis <shawn.willis@nelsonmullins.com>

Subject: Re: Dolphin Point / SIPOA

Sure, I would be happy to take a look at a proposed order.

Sent from my iPad

On May 25, 2023, at 3:01 PM, Shawn Willis <shawn.willis@nelsonmullins.com> wrote:

Trenholm,

Hope all is well. Pending resolution of SIPOA's motion for reconsideration and any appeal that may follow, SIPOA would like to deposit funds with the court under Rule 67 in order to stop the accrual of post-judgment interest and also stay execution of the judgment. Would you be willing to enter into a motion for a consent order granting leave for the deposit and granting the stay of execution? If so, I will put together a draft and send over to you for review.

Thanks,
Shawn



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