

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  
Circuit Court Case No. 2022-CP-26-01323

Appellate Case No. 2023-000192

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 BRIEF  
AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rules 240 and 263, SCACR, the Appellant Joel D. Barber (“Appellant”), through counsel, hereby moves for a ten (10) day extension of time to serve and file his Reply Brief and Designation of Matter to be included in the Record on Appeal (“Designation of Matter”), through and including August 21, 2023<sup>1</sup>.

Appellant’s Reply Brief and Designation of Matter are currently due on August 10, 2023, and therefore the original time to act has not yet expired. This is Appellant’s first request for an extension of time for his Reply Brief and Designation of Matter.

<sup>1</sup> An additional day is added for purposes of clarity since August 20, 2023, which date would be ten (10) days from the current due date, falls on a Sunday. Counsel for Respondents has agreed to a deadline of August 21, 2023.

The grounds for this motion are that the undersigned needs additional time to confer with his client regarding Respondents' Initial Brief and Designation of Matter and determine which issues and arguments warrant additional briefing in the Reply Brief. The undersigned also has other obligations and commitments in both the underlying matter pending before the trial court below and in other matters, both personal and professional, which create a need for additional time to prepare the Reply Brief and Designation of Matter, including but not limited to depositions in this matter currently scheduled to be taken by the undersigned on August 16, 2023, and also on August 24-25, 2023. Furthermore, an extension of time for ten (10) days will not result in any undue prejudice to Respondents, and will not unduly delay the matter.

Counsel for Respondents has stated via email exchange with the undersigned that he consents to the extension of time requested herein through August 21, 2023.

WHEREFORE, based on the foregoing, and for good cause shown, Appellant respectfully requests a ten (10) day extension of time to serve and file his Reply Brief and Designation of Matter, through and including August 21, 2023, and for such other relief as justice requires.

This the 1<sup>st</sup> day of August, 2023.

*/s/ Christian H. Staples*

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*Attorneys for Appellant*

**RECEIVED**

**Aug 01 2023**

**SC Court of Appeals**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the foregoing **APPELLANT'S MOTION FOR EXTENSION OF TIME TO SERVE AND FILE HIS REPLY BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** was served on all counsel of record via email addressed as follows:

James K. Gilliam, Esq.  
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*Attorneys for Respondents*

This the 1<sup>st</sup> day of August, 2023.

*/s/ Christian H. Staples*

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