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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, III, Master in Equity and Special Circuit Court Judge for Beaufort County

Case No. 2022-CP-07-02454
Appellate Case No. 2023-000411

Blue Bell Holdings, LLC..... Appellant

v.

Gary C. Johnson; Stephen D. Halpern; Holly A. Angel; Holly Ann LLC;
Belmont Properties, LLC; Johnson Halpern Partnership; Shoreline Funding
LLC and Orange Capital, LLC (Nevis)..... Respondents

**CONSENT MOTION FOR EXTENSION
OF TIME TO FILE APPELLANT’S INITIAL BRIEF
AND DESIGNATION OF MATTER**

Appellant Blue Bell Holdings, LLC, by and through its undersigned counsel and with the consent of Respondents Gary C. Johnson, Stephen D. Halpern, Holly A. Angel, Holly Ann LLC, Belmont Properties, LLC and Shoreline Funding, hereby requests an extension of time of twenty-one (21) days to file its initial brief and designation of matter. Appellant seeks this twenty-one day extension because of its counsel’s current workload. Currently, the deadline for Appellant’s initial brief and designation of matter is Thursday, August 10, 2023. If this request is granted, Appellant’s initial brief and designation of matter will be due on Thursday, August 31, 2023. Respondents’ counsel have consented to this request as evidenced by **Exhibit A**.

SOWELL & DuRANT, LLC

s/Bess J. DuRant

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August 2, 2023

Attorneys for Appellant Blue Bell Holdings, LLC

WE SO CONSENT:

s/Elizabeth J. Palmer

Elizabeth J. Palmer (S.C. Bar #73680)
SAXTON & STUMP, LLC
151 Meeting St., Ste. 350
Charleston, SC 29402
(843) 277-8034
ep@saxtonstump.com

Attorney for Respondent Gary C. Johnson and Shoreline Funding, LLC

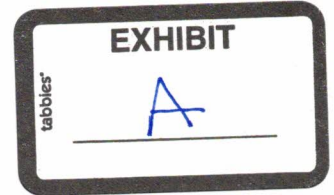
s/Lee Anne Walters

Lee Anne Walters (S.C. Bar No. 74984)
WALTERS LAW
Post Office Box 1214
Beaufort, SC 29902
(843) 379-0973
leeanne@walterslawsc.com

Attorney for Respondents Holly Angel, Holly Ann LLC, Stephen D. Halpern and Belmont Properties LLC

Amy Kelly

From: Lee Anne Walters <leeanne@walterslawsc.com>
Sent: Wednesday, August 2, 2023 10:10 AM
To: Bess DuRant; Elizabeth J. Palmer
Cc: Ashley Twombly (Work); Andrea Smith; Amy Kelly
Subject: Re: BBH appellate brief extension



Yes, I consent.

Lee Anne Walters, Esq. | 843.379.0973 | leeanne@walterslawsc.com

From: Bess DuRant <bdurant@sowelldurant.com>
Date: Wednesday, August 2, 2023 at 9:42 AM
To: Elizabeth J. Palmer <EP@saxtonstump.com>, Lee Anne Walters <leeanne@walterslawsc.com>
Cc: Ashley Twombly (Work) <twombly@twlawfirm.com>, Andrea Smith <andrea@twlawfirm.com>, Amy Kelly <akelly@sowelldurant.com>
Subject: RE: BBH appellate brief extension

Lee, ok with you?

Bess J. DuRant
Member, **SOWELL + DuRANT**

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V-Card

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From: Elizabeth J. Palmer <EP@saxtonstump.com>
Sent: Tuesday, August 1, 2023 11:58 AM
To: Bess DuRant <bdurant@sowelldurant.com>; Lee Anne Walters <leeanne@walterslawsc.com>
Cc: Ashley Twombly (Work) <twombly@twlawfirm.com>; Andrea Smith <andrea@twlawfirm.com>; Amy Kelly <akelly@sowelldurant.com>
Subject: RE: BBH appellate brief extension

No problem!
Beth

Elizabeth Palmer | Shareholder

151 Meeting Street, Suite 400

Charleston, SC 29401

Phone: 843.277.8034 | Internal: 1308

ep@saxtonstump.com

https://link.edgepilot.com/s/1c91f9aa/Y_IB_z4XUEqMD69ITPA6qA?u=http://www.saxtonstump.com/



From: Bess DuRant <bdurant@sowelldurant.com>

Sent: Tuesday, August 1, 2023 11:25 AM

To: Elizabeth J. Palmer <EP@saxtonstump.com>; Lee Anne Walters <leeanne@walterslawsc.com>

Cc: Ashley Twombly (Work) <twombly@twlawfirm.com>; Andrea Smith <andrea@twlawfirm.com>; Amy Kelly <akelly@sowelldurant.com>

Subject: BBH appellate brief extension

Beth and Lee Ann,

I plan on asking the Court of Appeals for a 2 or 3 week extension to file our initial brief and designation of matter due to my work conflicts.

May I note your consent?

Hope y'all are having good summers.

Thanks-
bjd

Bess J. DuRant

Member, **SOWELL + DuRANT**

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Gary C. Johnson; Stephen D. Halpern; Holly A. Angel; Holly Ann LLC;
Belmont Properties, LLC; Johnson Halpern Partnership; Shoreline Funding
LLC and Orange Capital, LLC (Nevis)..... Respondents

PROOF OF SERVICE

I certify that on August 2, 2023, I have caused the service of the Consent Motion for Extension of Time on Respondents Gary C. Johnson, Stephen D. Halpern, Holly A. Angel, Holly Ann LLC, Belmont Properties, LLC and Shoreline Funding via electronic mail using the email address listed in the Attorney Information System for their attorneys of record at the addresses listed below:

Elizabeth J. Palmer (S.C. Bar #73680)
SAXTON & STUMP, LLC
151 Meeting St., Ste. 350
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(843) 277-8034
ep@saxtonstump.com
Respondent Gary C. Johnson and Shoreline Funding, LLC

Lee Anne Walters (S.C. Bar No. 74984)
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Post Office Box 1214
Beaufort, SC 29902
(843) 379-0973
leanne@walterslawsc.com

Attorney for Respondents Holly Angel, Holly Ann LLC, Stephen Halpern and Belmont Properties LLC

I certify that on August 2, 2023, I have caused the service of the Notice of Dismissal of Johnson Halpern Partnership on Respondent Orange Capital, LLC (Nevis) by depositing a copy of the same in the United States Mail, postage prepaid to their addresses as listed below:

Gary C. Johnson
Manager, Orange Capital, LLC
17 Harbourside Lane 7118
Hilton Head, SC 29928

SOWELL & DuRANT, LLC

s/Bess J. DuRant

BY:

Thornwell F. Sowell, III (SC Bar No. 5197)
Bess J. DuRant (SC Bar No. 77920)
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twombly@twlawfirm.com

August 2, 2023

Attorneys for Appellant Blue Bell Holdings, LLC

Amy Kelly

From: Amy Kelly
Sent: Wednesday, August 2, 2023 5:26 PM
To: 'leeanne@walterslawsc.com'; 'assistant@walterslawsc.com'; 'ep@saxtonstump.com'; 'mhollar@saxtonstump.com'
Cc: Bess DuRant; 'Ashley Twombly'; 'Andrea Smith'
Subject: Blue Bell v. Johnson et al- Appellate Case No. 2023-000411
Attachments: Consent Motion for Extension of Time.pdf; Exhibit A- Consent to Extension.pdf; Proof of Service- Consent Motion for Extension of Time.pdf

Attached and served upon you is the Consent Motion for Extension of Time, the Exhibit A and the Proof of Service. Service is made via email pursuant to the Supreme Court Order 2021-08-25-02 as amended May 6, 2022.

Thanks
Amy

Amy A. Kelly
Director of Administration/Paralegal, SOWELL + DuRANT

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Columbia, SC 29201

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