

**RECEIVED**

**Oct 09 2023**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Horry County  
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

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Appellate Case No. 2023-000969  
Circuit Court Case No. 2021-CP-26-05377

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Terence Sullivan,

Appellant,

v.

Ocean 22 Vacation Owners' Association, Inc.,

Respondent.

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**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL BRIEF OF RESPONDENT**

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CLEMENT RIVERS, LLP  
Edward D. Buckley, Jr. (SC Bar No. 994)  
Nicholas J. Rivera (SC Bar No. 77186)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488

*Attorneys for Respondent*

COMES NOW Respondent Ocean 22 Vacation Owners' Association, Inc., by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(2), the deadline for Respondent's initial brief and designation of matter is Today, October 9, 2023. On account of work-related and other time commitments, Respondent respectfully requests this deadline be extended by 30 days. Respectfully, Respondent believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

WHEREFORE, Respondent moves this Honorable Court to grant it an extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial brief and designation of matter would be November 8, 2023, according to the undersigned's calculations. Further, Respondent respectfully requests the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
CLEMENT RIVERS, LLP  
Edward D. Buckley, Jr. (SC Bar No. 994)  
Nicholas J. Rivera (SC Bar No. 77186)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
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(843) 720-5488  
*Attorneys for Respondent*

Charleston, South Carolina

October 9, 2023

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**PROOF OF SERVICE**

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25 Calhoun Street, Suite 400 (29401)  
P.O. Box 993  
Charleston, South Carolina 29402  
(843) 720-5488

*Attorneys for Respondent*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondent, hereby certify that **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT** was served on all other parties to this appeal on October 9, 2023, via email (see attached) to their following counsel of record:

J. Clay Hopkins, Esquire  
Hopkins Law Firm, LLC  
[clay@hopkinsfirm.com](mailto:clay@hopkinsfirm.com)  
*Attorneys for Appellant*

CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines  
*Attorneys for Respondent*

Charleston, South Carolina

October 9, 2023

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Monday, October 9, 2023 2:39 PM  
**To:** 'clay@hopkinsfirm.com'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Sullivan v. Ocean 22 Vacation Owners' Association, Inc.; Appellate Case No. 2023-000969 (CR 210842)  
**Attachments:** Motion for Extension - Initial Brief of Respondent.pdf

Enclosed please find Respondent's Motion for Extension of Time to File/Serve their Initial Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 200 • Charleston, SC 29401  
FOR GREAT