

RECEIVED

Oct 13 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough

Case No. 2017-CP-10-03099

Appellate Case No. 2022-001479

Elizabeth Heatley, Neil B. McCann, Jr., David Neil Monk, Thomas V. Bessent, and
Mariner's Cay Marina Council of Co-Owners, Inc.,.....Respondents,

v.

Mariner's Cay Marina Condo, LLC, Mariner's Cay Fuel Dock, LLC, George A. Farmer.,
Jr., and South Atlantic Bank, Defendants,

Of which Mariner's Cay Marina Condo, LLC, Mariner's Cay Fuel Dock, LLC, and George
A. Farmer., Jr. are the.....Appellants.

APPELLANTS' SECOND MOTION FOR AN EXTENSION
OF TIME TO FILE THE RECORD ON APPEAL

The Appellants, by and through their undersigned counsel, hereby move the Court
for an order granting the Appellants an extension to file the Record on Appeal due to its
voluminous size and the fact that Counsel for the Appellants has been in multiple back to
back trials.

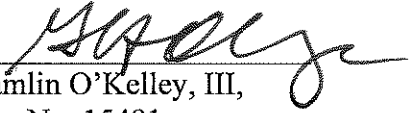
Counsel requests that all timelines be held in abeyance while the Court considers
this request.

SIGNATURE BLOCK ON FOLLOWING PAGE

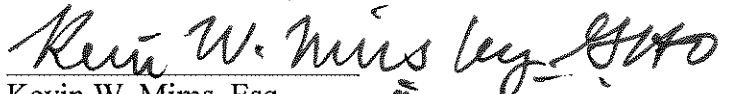
Mt. Pleasant, South Carolina

October 13, 2023

BUIST BYARS & TAYLOR, LLC


G. Hamlin O'Kelley, III,
SC Bar No. 15491
652 Coleman Blvd., Suite 200
Mt. Pleasant, SC 29464
T: (843) 856-4488
F: (843) 856-0613
Hamlin.okelley@buistbyars.com
*Attorney for Appellants Mariners Cay
Marina Condo, LLC, and Mariners Cay Fuel
Dock, LLC and South Atlantic Bank*

LUZURIAGA MIMS, LLP


Kevin W. Mims, Esq. *with permission*
SC Bar No. 69418
Whidbee S. Perrin, Esq.
SC Bar No. 100396
50 Immigration St, Suite 200
Charleston, SC 29403
(843) 410-4713
kmims@lmlawllp.com
wperrin@lmlawllp.com
*Attorneys for Appellants Mariners Cay
Marina Condo, LLC and George A. Farmer,
Jr.*

RECEIVED

Oct 13 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough

Case No. 2017-CP-10-03099

Appellate Case No. 2022-001479

Elizabeth Heatley, Neil B. McCann, Jr., David Neil Monk, Thomas V. Bessent, and
Mariner's Cay Marina Council of Co-Owners, Inc.,.....Respondents,

v.

Mariner's Cay Marina Condo, LLC, Mariner's Cay Fuel Dock, LLC, George A. Farmer.,
Jr., and South Atlantic Bank, Defendants,

Of which Mariner's Cay Marina Condo, LLC, Mariner's Cay Fuel Dock, LLC, and George
A. Farmer., Jr. are the.....Appellants.

PROOF OF SERVICE

I certify that I have served the Appellants' Second Motion for Extension to file the Record
on Appeal by depositing a copy of same Via Email cgb@barrungermcintosh.com,
DCleveland@clawsonandstaubes.com.

[SIGNATURES ON FOLLOWING PAGE]

Mt. Pleasant, South Carolina
October 13, 2023

BUIST BYARS & TAYLOR, LLC

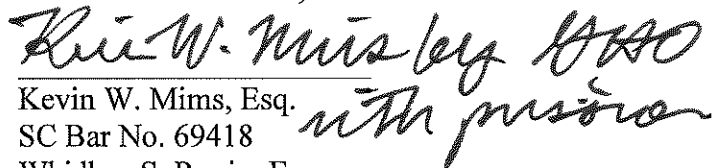


G. Hamlin O'Kelley, III,
SC Bar No. 15491
652 Coleman Blvd., Suite 200
Mt. Pleasant, SC 29464
T: (843) 856-4488
F: (843) 856-0613

Hamlin.okelley@buistbyars.com

*Attorney for Appellants Mariners Cay
Marina Condo, LLC, and Mariners Cay Fuel
Dock, LLC and South Atlantic Bank*

LUZURIAGA MIMS, LLP



Kevin W. Mims, Esq.
SC Bar No. 69418
Whidbee S. Perrin, Esq.
SC Bar No. 100396

50 Immigration St, Suite 200
Charleston, SC 29403
(843) 410-4713

kmims@lmlawllp.com

wperrin@lmlawllp.com

*Attorneys for Appellants Mariners Cay
Marina Condo, LLC and George A. Farmer,
Jr.*



652 Coleman Blvd., Suite 200
Mount Pleasant, SC 29464
Direct Dial 843.284.1408
Main 843.856.4488

G. Hamlin O'Kelley, III
Attorney At Law
Hamlin.okelley@buistbyars.com

October 13, 2023

RECEIVED
Oct 13 2023
SC Court of Appeals

VIA EMAIL: ctappfilings@sccourts.org
AND US MAIL
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29211

*RE: Elizabeth Heatley v Mariners Cay Marina Condo, LLC et al.,
C/A No.: 2017-CP-10-3099 Appellate Case No. 2022-001479
Client File No.: 1219.0019*

Dear Ms. Kitchings:

Enclosed for filing please find one the original and one (1) copy of the Appellants' Second Motion for Extension to file the Record on Appeal in the above-referenced matter along with an original and one (1) copy of the Proof of Service and filing fee in the amount of \$50.00.

By copy of this letter, I am serving same upon all counsel. Should you have any questions, please feel free to contact me.

With kindest regards, I remain

Yours very truly,

G. Hamlin O'Kelley, III

GHOIII/atd

Cc: w/ Motion Encl. Via Email Only

Capers G. Barr, III, Esq. (cgb@barrungermcintosh.com)

Capers G. Barr, IV, Esq. (cbarr@barrungermcintosh.com)

David C. Cleveland, Esq. (DCleveland@clawsonandstaubes.com)

Kevin W. Mims, Esq. (KMims@lmlawllp.com)

Whidbee S. Perrin, Esq. (wperrin@lmlawllp.com)