

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

**RECEIVED**

**Nov 07 2023**

**SC Court of Appeals**

---

Appeal from Horry County  
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

---

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

Terence Sullivan,

Appellant,

v.

Ocean 22 Vacation Owners' Association, Inc.,

Respondent.

---

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

---

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 a second 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, by order of this Court filed October 11, 2023, the deadline for Respondent's initial brief and designation of matter is November 8, 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 a second 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 December 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.

*[signature on next page]*

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

Charleston, South Carolina 29402

(843) 720-5488

*Attorneys for Respondent*

Charleston, South Carolina

November 7, 2023