

RECEIVED

Nov 17 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

Honorable Benjamin H. Culbertson, Circuit Court Judge

Case No. 2023-CP-26-00045

Suzanne N. Norton, Individually, Kenneth R. Norton, Individually, Suzanne N. Norton, as Trustee of the Suzanne N. Norton Living Trust dated May 8, 2012, and Kenneth R. Norton, as Trustee of the Kenneth R. Norton Living Trust dated May 8, 2014,**Appellants**

v.

Tidewater Plantation Community Association, Inc., and Tidewater Plantation Community Association Design Review Board,**Respondents.**

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

Appellant’s Reply Brief is due to be filed on December 4, 2023. Due to a heavy workload and upcoming holidays, I am hereby respectfully requesting a forty-five (45) day extension of time to file Appellants’ Reply Brief. If this request is granted, Appellants’ Reply Brief would be due on January 18, 2024. This is Appellant’s first request for an extension of time to file Appellants’ Reply Brief and this Motion is not intended for purposes of delay.

WHEREFORE, Appellants respectfully request that this Court grant Appellants an extension of time to file their Reply Brief in this matter.

Respectfully submitted,

/s/ Howell V. Bellamy, III

Howell V. Bellamy, III, SC Bar # 66575
BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.
P.O. Box 357
Myrtle Beach, SC 29578
(843) 448-2400
hbellamyiii@bellamylaw.com
Counsel for Appellant

RECEIVED

Nov 17 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

Honorable Benjamin H. Culbertson, Circuit Court Judge

Case No. 2023-CP-26-00045

Suzanne N. Norton, Individually, Kenneth R. Norton, Individually, Suzanne N. Norton, as Trustee of the Suzanne N. Norton Living Trust dated May 8, 2012, and Kenneth R. Norton, as Trustee of the Kenneth R. Norton Living Trust dated May 8, 2014, **Appellants**

v.

Tidewater Plantation Community Association, Inc., and Tidewater Plantation Community Association Design Review Board, **Respondents.**

PROOF OF SERVICE

I certify that I have served the Motion for Extension to File Appellant’s Initial Brief and Designation of Matter on Respondents, Tidewater Plantation Community Association, Inc., and Tidewater Plantation Community Association Design Review Board, by emailing a copy of the motion to all counsel of record on January 18, 2023, as follows:

Taylor Leigh Cary, Esquire
Douglas Walker MacKelcan III, Esquire
Copeland, Stair, Valz & Lovell, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401

Attorneys for Respondents Tidewater Plantation Community Association, Inc., and Tidewater Plantation Community Association Design Review Board

/s/ Howell V. Bellamy, III

Howell V. Bellamy, III, SC Bar # 66575
BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.

P.O. Box 357
Myrtle Beach, SC 29578
(843) 448-2400

hbellamyiii@bellamylaw.com

Counsel for Appellant

HOWELL V. BELLAMY, JR.
EDWARD B. BOWERS, JR.*
M. EDWIN HINDS, JR.
DAVID B. MILLER⁺
C. WINFIELD JOHNSON, III
DOUGLAS M. ZAYICEK
MARTIN C. DAWSEY*
ROBERT S. SHELTON⁺
HOWELL V. BELLAMY, III
GEORGE W. REDMAN, III^{+ ** ++}
BENJAMIN A. BAROODY^{+ *** ++}

* LLM TAXATION
** LICENSED IN SC & NC
⁺ CERTIFIED MEDIATOR
⁺⁺ CERTIFIED ARBITRATOR



THE **BELLAMY**
LAW FIRM

OFFICES IN MYRTLE BEACH & PAWLEYS ISLAND

WWW.BELLAMLAW.COM

1000 29TH AVENUE NORTH • P.O. BOX 357 • MYRTLE BEACH, SC 29578
TELEPHONE (843) 448-2400 • FACSIMILE (843) 448-3022

Writer's Direct Dial: 843-282-5387
Email: HBellamyiii@BellamyLaw.com

November 16, 2023

VIA EMAIL: ctappfilings@sccourts.org

Ms. Jenny Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate St.
Columbia SC 29201

RE: **APPELLANTS' FILING FEE FOR MOTION FOR EXTENSION OF TIME**
Suzanne N. Norton, et al. v. Tidewater Plantation Community Association, Inc. et al.
Horry County Common Pleas Court Case No. : 2023-CP-26-00045

Dear Ms. Kitchings:

The Initial Brief of Appellant and Designation of Matter in the above-referenced case are due on December 4, 2023. However, due to my heavy workload and the upcoming holidays, I respectfully request a fort-five (45) day extension in which to serve and file this brief. No prior extensions have been requested in this case.

Enclosed is my Motion For Extension of Time and a check in the amount of \$50 for the filing of same.

Please do not hesitate to contact me if you have any questions. Thank you for your assistance in this matter.

Sincerely,

**BELLAMY, RUTENBERG, COPELAND
EPPS, GRAVELY & BOWERS, P.A.**

/s/ Howell V. Bellamy, III

Howell V. Bellamy, III

HVBiii/tlb
Enclosure

cc: Taylor Leigh Carey, Esq.
Douglas Walker MacKelcan, III, Esq.

PHILLIP H. ALBERGOTTI* **
HAYES K. STANTON⁺ **
KARA J. KEITH **
HOLLY M. LUSK
LAUREN BREARLEY BENTON
JON CRAIG HOWELL, JR.
ZACHARY J. CROWL**
BRICE A. BERTSCHIN
ALLIE BARTH TILLER

RETIRED:
JOHN K. RUTENBERG (1939-2012)
JOHN E. COPELAND
CLAUDE M. EPPS, JR.
DAVID R. GRAVELY
JILL F. GRIFFITH
BRADLEY D. KING

RECEIVED

Nov 17 2023

SC Court of Appeals