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Nov 20 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Appellate Case No.: 2023-000411

Blue Bell Holdings, LLC Appellants,

vs.

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

**CONSENT MOTION FOR SECOND EXTENSION OF TIME TO FILE AND SERVE
RESPONDENT GARY C. JOHNSON’S INITIAL BRIEF AND DESIGNATION OF
MATTER**

Pursuant to the South Carolina Court of Appeals Rules, Respondent Gary C. Johnson, (“Respondent”), by and through his undersigned counsel, hereby moves the Court for an order granting Respondent a thirty (30) day extension of time, until December 22, 2023, in which to file and serve Respondent’s Initial Brief and Designation of Matter. This is Respondent’s second request for an extension. Respondent would submit that this extension is necessary due to counsel’s current case load, including the fact that approximately 20 motions were scheduled to be heard in this matter and the two pending related matters last Thursday. Preparation for those hearings took considerably more time than anticipated, and not all motions were reached during the hearing, resulting in a second hearing being scheduled for mid-December. Additionally, counsel has family in town for the Thanksgiving holiday and would appreciate the opportunity to spend time with

them.

Currently, the deadline for Respondent's Initial Brief and Designation of Matter is Wednesday, November 22, 2023. If the request is granted, Respondent's Initial Brief and Designation of Matter will be due on Friday, December 22, 2023. Counsel for Respondent conferred with all parties of his request for this extension and obtained the consent of all parties.

s/ Elizabeth J. Palmer

Elizabeth J. Palmer (SC Bar#: 73680)

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Attorneys for Respondent Gary C. Johnson

Charleston, South Carolina
November 20, 2023

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PROOF OF SERVICE

I do hereby certify that on November 20, 2023, I have served all counsel in this action with
a copy of the *Consent Motion for Second Extension of Time to File and Serve Respondent Gary
C. Johnson’s Initial Brief and Designation of Matter* via email to the following email addresses:

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

s/ Taylor Davis _____
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SC Court of Appeals

Direct Dial: (843) 278-0114
Email: tdavis@saxtonstump.com

November 20, 2023

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Blue Bell Holdings, LLC vs. Gary C. Johnson, et al.
Appellate Case No.: 2023-000411

Dear Ms. Kitchings:

Please find enclosed a check in the amount of \$50.00, to cover the filing fee for the Consent Motion for Second Extension of Time to File and Serve Respondent Gary C. Johnson's Initial Brief and Designation of Matter and Proof of Service in connection with the above referenced matter. Also enclosed is a copy of the motion, which has been e-filed.

Should you have any questions or concerns, please do not hesitate to contact us. Thank you for your assistance with this matter.

Sincerely,

s/ Taylor Davis

Taylor Davis
Paralegal

/tnd

Enclosures

cc (via email only): J. Ashley Twombly, Esquire
Thomas Iandoli, Esquire
Bess DuRant, Esquire
Lee Anne Walters, Esquire