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Dec 08 2023

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE 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.

**THIRD 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

NOW COMES Respondent, Ocean 22 Vacation Owners' Association, Inc., by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an additional extension of two (2) weeks' 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 November 8, 2023, the deadline for Respondent's initial brief and designation of matter is today, December 8, 2023. The undersigned recognizes that the Court's November 8, 2023, order states, "[n]o further extensions will be granted absent extraordinary circumstances," and he does not make this motion lightly, but because of work-related and other time commitments—including, most significantly, those occasioned by and in the wake of a recent death in the undersigned's immediate family that resulted in his unexpected absence from the office the week following Thanksgiving, as well as the disruption to the normal work schedule occasioned by the Thanksgiving holiday itself—the undersigned is in need of additional time to complete Respondent's initial brief and therefore requests that the deadline for serving/filing the same be extended by an additional two (2) weeks. Submitting that the relief requested herein is in the interests of justice and will not result in any undue prejudice to Appellant, the undersigned most respectfully asks that the Court consider the circumstances that occasioned the instant request sufficient to warrant the grant of such relief.

WHEREFORE, the undersigned moves this Honorable Court to grant an additional extension of two (2) weeks' time to file/serve Respondent's initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the deadline for filing/serving Respondent's initial brief and designation of matter would be Friday, December 22, 2023, according to the undersigned's calculations. Further, the undersigned respectfully requests that the Court hold Respondent's 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)
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Charleston, South Carolina

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PROOF OF SERVICE

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

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondent, hereby certify that the **THIRD MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT** was served on all other parties to this appeal on December 8, 2023, via email (see attached) to their following counsel of record:

J. Clay Hopkins, Esquire
Hopkins Law Firm, LLC
clay@hopkinsfirm.com
Attorneys for Appellant

CLEMENT RIVERS, LLP

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

Charleston, South Carolina

December 8, 2023

From: [Hines, Russell](#)
To: clay@hopkinsfirm.com
Cc: [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#)
Subject: Sullivan v. Ocean 22 Vacation Owners" Association, Inc. (Appellate Case No. 2023-000969) (CR 210842) -- Third Motion for Extension of Time to File/Serve Initial Brief of Respondent
Date: Friday, December 8, 2023 6:15:11 PM
Attachments: [image002.png](#)
[Sullivan v. Ocean 22 \(23-000969\) -- Respondent's 3d Mot. for Ext.pdf](#)

Enclosed for service in the above-referenced matter please find the **Third Motion for Extension of Time to File/Serve Initial Brief of Respondent.**

Russell G. Hines
CLEMENT RIVERS, LLP
www.ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
Phone: (843) 720-5488
Fax: (843) 579-1327
Email: rhines@ycrlaw.com



CLEMENT RIVERS, LLP

25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com