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Dec 13 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Honorable Kristi F. Curtis, Circuit Court Judge

Appellate Case No. 2023-001023
Case No. 2020-CP-26-05267

25th Avenue, LLC,

Respondent,

v.

Carol Ann Honeycutt,

Appellant.

RESPONDENT'S MOTION FOR ENLARGEMENT OF TIME TO FILE RETURN

Pursuant to Rule 240(e), SCACR, Respondent 25th Avenue, LLC (hereinafter "Respondent") respectfully requests an enlargement of time within which to file its Return to Appellant Carol Ann Honeycutt's (hereinafter "Appellant") Motion to Reinstate.

Appellant's Motion to Reinstate was filed with the Court on November 22, 2023 via email on which the undersigned was not copied, and it was received in Respondent's counsel's office via regular U.S. Mail on November 30, 2023. Appellant filed another correspondence with the Court on December 5, 2023 concerning the grounds for her Motion to Reinstate. Respondent respectfully requests an enlargement of time of December 22, 2023 to file its Return to Appellant's Motion to Reinstate.

WHEREFORE, having fully set before this Court the grounds for this Motion, the Respondent moves for an Order granting an enlargement of time of December 22, 2023 for filing its Return to Appellant's Motion to Reinstate.

Respectfully submitted,

BURR & FORMAN LLP

s/Taylor K. Voegel

Taylor K. Voegel, SC Bar #104770
Henrietta U. Golding, SC Bar #2173
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Attorneys for the Respondent

Myrtle Beach, South Carolina

December 13, 2023

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Carol Ann Honeycutt,

Appellant.

PROOF OF SERVICE

I, Taylor K. Voegel, of Burr & Forman LLP, attorney for the Respondent, hereby certify that **Respondent's Motion for Enlargement of Time to File Return** was served on Appellant on December 13, 2023, via electronic communications (see attached), and via regular U.S. Mail, postage prepaid and affixed thereto, addressed as follows:

Carol Ann Honeycutt, *pro se*
Post Office Box 8574
Myrtle Beach, SC 29578
Email: auso2@southcarolina.usa.com

[Signature Block on Following Page]

Respectfully submitted,

BURR & FORMAN LLP

s/Taylor K. Voegel

Taylor K. Voegel, SC Bar #104770
Henrietta U. Golding, SC Bar #2173
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Attorneys for the Respondent

Myrtle Beach, South Carolina

December 13, 2023

Subject: 25th Avenue, LLC v. Carol A. Honeycutt 2023-001023

Date: 12/13/2023 4:30 PM

From: "Evans, Sheila" <SEvans@burr.com>

To: "Carol Ann Honeycutt" <auso2@southcarolina.usa.com>

Cc: "Golding, Henrietta" <HGolding@burr.com>, "Voegel, Taylor" <tvoegel@burr.com>

Ms. Honeycutt,

For service upon you, please find attached a copy of Respondent's Motion for Enlargement of Time to file Return and Proof of Service that we will be filing with the Court momentarily.

Sheila

Sheila Evans

Paralegal



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