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Jan 08 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Marvin H. Dukes, Master In Equity and Special Circuit Court Judge
Trial Court Case No. 2022-CP-07-02454

Appellate Case No. 2023-000411

Blue Bell Holdings, LLC..... Appellant

v.

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

**APPELLANT’S MOTION FOR EXTENSION OF TIME
TO FILE AND SERVE ITS REPLY BRIEF**

Pursuant to the South Carolina Court of Appeals Rules, Blue Bell Holdings, LLC (“Appellant”) by and through its undersigned counsel, hereby moves the court for an order granting Appellant a ten (10) day extension of time, until January 22, 2024, in which to file and serve its Reply Brief. Appellant would submit that this extension is necessary due to the fact the counsel for Appellant has been ill and under the weather for several weeks. The deadline has not been previously extended.

Counsel for Appellant has conferred with all parties of its request for this extension and obtained the consent of all parties.

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January 8, 2024

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

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Blue Bell Holdings, LLC Appellant,

v.

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

PROOF OF SERVICE

The undersigned certifies that on the 8th day of January 2024 a copy of Appellant’s Motion for Extension of Time to File and Service its Reply Brief have been served upon counsel of record for Respondents via electronic mail using the email addresses listed in the Attorney Information System (AIS) as set forth below:

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Respectfully submitted,

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*LICENSED IN SC + GA
+SC CIRCUIT COURT MEDIATOR

January 8, 2024

Via Electronic and U.S. Mail

The Honorable Jenny Abbott Kitchings
Court of Appeals Clerk of Court
P.O. Box 11629
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ctappfilings@sccourts.org

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Jan 08 2024

SC Court of Appeals

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

Dear Ms. Kitchings:

Enclosed please find for filing Appellant's Motion for Extension of Time to File and Service its Reply Brief in the referenced matter. By copy of this letter and as evidenced by the Proof of Service, this filing has been served on Respondents.

Pursuant to paragraph (c) of the Supreme Court's Order dated August 25, 2021 ("Methods of Electronic filing and Service Under Rule 252 of the South Carolina Appellate Rules") a check in the amount of \$50.00 for the filing fee is being forwarded via U.S. mail.

Thank you for your consideration of this request. If you have any questions, please do not hesitate to contact me.

With kindest personal regards, I remain,

Cordially,



J. Ashley Twombley

cc: Thornwell F. Sowell, III, Esquire (bsowell@sowelldurant.com)
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