

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

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Case No.: 2005-CP-10-4101

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The Milton P. Demetre Family Limited Partnership .....Appellant

v.

Harry Beckmann, III, Patricia P. Beckmann, Annie Ruth Hilton Crowley,  
Raymond Moody Crowley, Donald William Crowley, Harris L. Crowley, Jr.,  
and Annie Ruth Crowley Atkinson .....Respondents

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**APPELLANT'S REPLY IN SUPPORT OF  
APPELLANT'S MOTION TO EXTEND THE TIME  
TO COMPLY WITH THIS COURT'S JUNE 19, 2013 ORDER  
PENDING RESOLUTION OF APPELLANT'S MOTION  
TO ACCEPT THE RECORD ON APPEAL AS FILED**

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Respondents oppose Appellant's Motion, stating in pertinent part:

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3. There is no reason for Appellant to delay complying with this Court's Order above, because there is no rational relationship between the relief sought in this Motion, and the facts of this Appeal.

However, as made clear by Respondents' Return to Appellant's Motion to Accept the Record on Appeal, other than Appellant's taking action to comply with any Order resolving Respondents' pending motion to include the 1786 Plat in an Appendix to the Record on Appeal, Respondents acknowledge that there is no further action required for Appellant to comply with this Court's June 19, 2013 Order:

In other words, if this Court does not allow the inclusion of the "1786 Plat," the Record on Appeal as filed will be accepted by this Court, without any action by Appellant's counsel.

(Return to Appellant's Motion to Accept the Record on Appeal as Filed, p. 5).

Respondents further argue in their Return to this Motion:

4. It is important to note that Appellant's counsel provides this Court with no ground or reason to grant its Motion, which contains only one conclusory sentence.

(Respondent's Return, p. 4).

However, Appellant's Motion to Extend the Time to Comply with this Court's June 19, 2013 Order Pending Resolution of Appellant's Motion to Accept the Record on Appeal as Filed was based on the reasons set forth in and incorporated by reference Appellant's Motion to Accept the Record on Appeal as Filed, stating:

Appellant respectfully moves this honorable Court to extend Appellant's time to comply with this Court's Order issued June 19, 2013 pending resolution of Appellant's July 19, 2013 Motion to Accept the Record on Appeal as filed, which incorporated herein by reference, for the reasons set forth therein.

(Appellant's Motion to Extend the Time to Comply with this Court's June 19, 2013 Order Pending Resolution of Appellant's Motion to Accept the Record on Appeal as Filed, p. 1).

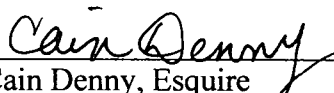
Thus, the reason for the brevity of the Motion was not that the Motion lacked grounds, but that those grounds were already set forth in the sister motion. For the same reason, rather than restating the arguments here, Appellant hereby incorporates by reference Appellant's Reply in Support of Appellant's Motion to Accept the Record on Appeal as Filed.

WHEREFORE, for the reasons set forth herein as well as in Appellant's Reply in Support of Appellant's Motion to Accept the Record on Appeal as Filed, Appellant's Motion to Extend the Time to Comply with this Court's June 19, 2013 Order Pending Resolution of Appellant's Motion to Accept the Record on Appeal as Filed should be granted.

August 2, 2013

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Case No.: 2005-CP-10-4101

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Raymond Moody Crowley, Donald William Crowley, Harris L. Crowley, Jr.,  
and Annie Ruth Crowley Atkinson .....Respondents.

PROOF OF SERVICE

I certify that I have served a copy of (1) Appellant's Reply to Respondents' Return to Appellant's Motion to File and Serve Supplemental Return of Appellant to Respondents' Motion to Compel Inclusion of Material Omitted from Record on Appeal, (2) Appellant's Reply in Support of Appellant's Motion to Accept the Record on Appeal as Filed, and (3) Appellant's Reply in Support of Appellant's Motion to Extend the Time to Comply with this Court's June 19, 2013 Order Pending Resolution of Appellant's Motion to Accept the Record on Appeal as Filed on Harry Beckmann, III, Patricia P. Beckmann, Annie Ruth Hilton Crowley, Raymond Moody Crowley, Donald William Crowley, Harris L. Crowley, Jr., and Annie Ruth Crowley Atkinson by depositing a copy of it in the United States Mail, postage prepaid, on August 2, 2013, addressed to their attorneys of record, Jefferson D. Griffith, III, Esquire, and Richard L. Witt, Esquire, Austin & Rogers, P.A., Post Office Box 11716, Columbia, South Carolina 29211.

August 2, 2013

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August 2, 2013

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

Re: The Milton P. Demetre Family Limited Partnership vs.  
Harry Beckmann, III, et al  
Appellate Case No. 2012-212136

Dear Ms. Kitchings:

Enclosed for filing please find:

- The original and seven (7) copies of Appellant's Reply to Respondents' Return to Appellant's Motion to File and Serve Supplemental Return of Appellant to Respondents' Motion to Compel Inclusion of Material Omitted from Record on Appeal;
- The original and seven (7) copies of Appellant's Reply in Support of Appellant's Motion to Accept the Record on Appeal as Filed;
- The original and seven (7) copies of Appellant's Reply in Support of Appellant's Motion to Extend the Time to Comply with this Court's June 19, 2013 Order Pending Resolution of the Appellant's Motion to Accept the Record on Appeal as Filed; and
- The original and one copy of Proof of Service for the above items.

Please return stamped copies in the envelope provided.

Best wishes.

Very truly yours,

*Cain Denny*

Cain Denny

c.c. Jefferson D. Griffith, III, Esquire (with enclosures)  
Richard L. Witt, Esquire (with enclosures)  
John Hughes Cooper, Esquire (with enclosures)  
Mr. Milton P. Demetre (with enclosures)

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