

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable Benjamin H. Culbertson
Circuit Court Judge

Civil Action No. 2022-CP-22-00912
Appellate Case No. 2024-000023

Michael T. Green and Carrie J. Green; Julian P. Rutledge and Melvin L. Rutledge; Carlethia B. Jenkins; Frances Jo Baker; Parkersville Planning & Development Alliance, Inc.; Keep It Green, Inc.; and Preserve Murrells Inlet, Inc.

..... Appellants,

v.

Georgetown County; Laine CRE, LLC; TriStar Land, LLC; and Samuel J. Nesbit on behalf of the heirs of Will Nesbit

..... Respondents.

MOTION FOR EXTENSION OF TIME

Respondents Laine CRE, LLC and TriStar Land, LLC (“Respondents”) respectfully request a thirty-day extension of time to file their initial brief and designation of matter. The current deadline of Respondents Laine CRE, LLC’s and TriStar Land, LLC’s initial brief and designation of matter is May 6, 2024. With a thirty-day extension the new deadline for Respondents’ initial brief and designation of matter would be June 5, 2024. This court has already issued an order extending Respondent Georgetown County’s time to file its initial brief and designation of matter to June 5, 2024. Respondents request this extension and so that its initial brief and designation of matter is due on the same date as Georgetown County’s, and because of scheduling issues and

professional obligations of counsel. This is Respondents Laine CRE, LLC's and TriStar Land, LLC's first request for an extension of these deadlines.

Respondents Laine CRE, LLC and TriStar Land, LLC request the current deadline be held in abeyance until this Court issues an order on this motion.

DARROWEVERETT LLP

/s/ Matthew E. Pecoy

Matthew E. Pecoy (SC Bar No. 076657)

28 Broad Street, Suite 204

Charleston, SC 29401-3058

(843) 867-2801

mpecoy@darroweverett.com

ATTORNEYS FOR RESPONDENTS

LAINÉ CRE, LLC AND TRISTAR

LAND, LLC

May 2, 2024

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable Benjamin H. Culbertson
Circuit Court Judge

Civil Action No. 2022-CP-22-00912
Appellate Case No. 2024-000023

Michael T. Green and Carrie J. Green; Julian P. Rutledge and Melvin L. Rutledge; Carlethia B. Jenkins; Frances Jo Baker; Parkersville Planning & Development Alliance, Inc.; Keep It Green, Inc.; and Preserve Murrells Inlet, Inc.

..... Appellants,

v.

Georgetown County; Laine CRE, LLC; TriStar Land, LLC; and Samuel J. Nesbit on behalf of the heirs of Will Nesbit

.....Respondents.

PROOF OF SERVICE

I, the undersigned paralegal of the law offices of DarrowEverett LLP, do hereby certify that on May 2, 2024, I have served all counsel in this action with a copy of the pleading hereinbelow by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to Rule 262 of the South Carolina Appellate Court Rules and the April 24, 2024 Amended Order of the South Carolina Supreme Court (Appellate Case No. 2020-000447). Service on Pro-se Respondent Samuel J. Nesbit on behalf of the heirs of Will Nesbit has been mailed, via U.S. Mail, postage paid.

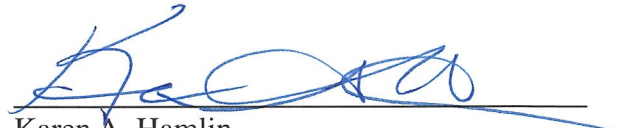
Document Served: Motion for Extension of Time to File Respondents' Initial Brief and Designation of Matter

Counsel Served: Via Email Only
Cynthia Ranck Person, Esq.
Keep It Green Advocacy, Inc.
kig.advocacy@gmail.com
F. Patrick Hubbard, Esq.
phubbard@law.sc.edu
Attorneys for Appellant

H. Thomas Morgan, Jr.
tommy.morgan@smithrobinsonlaw.com
Sydney J. Douglas
sydney.douglas@smithrobinsonlaw.com
Shanon N. Peake
shanon.peake@smithrobinsonlaw.com
Attorneys for Respondent Georgetown County

Pro Se Party Served: Via US Mail Only
Samuel J. Nesbit, on behalf of the heirs of Will Nesbit
6201 Rosebud Street
Columbia, SC 29203
Pro Se Respondent

DARROWEVERETT LLP


Karen A. Hamlin

May 2, 2024