

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.

**RESPONDENTS’ SECOND MOTION FOR EXTENSION OF TIME**

Respondents Laine CRE, LLC and TriStar Land, LLC (“Respondents”) respectfully request a second 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 June 5, 2024. With a second thirty-day extension the new deadline for Respondents’ initial brief and designation of matter would be July 5, 2024.

Respondents request this second extension so that its initial brief and designation of matter is due on the same date as Respondent Georgetown County’s, which is also filing a second request

for this same extension of time, and because of scheduling issues and professional obligations of counsel.

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*

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**ATTORNEYS FOR RESPONDENTS**

**LAINÉ CRE, LLC AND TRISTAR**

**LAND, LLC**

May 30, 2024

**RECEIVED**

**May 30 2024**

**SC Court of Appeals**

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..... Respondents.

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**PROOF OF SERVICE**

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I, the undersigned paralegal of the law offices of DarrowEverett LLP, do hereby certify that on May 30, 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:** Respondents' Second Motion for Extension of Time to File Initial Brief and Designation of Matter

**Counsel Served:** Via Email Only  
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**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  
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**Pro Se Respondent**

**DARROWEVERETT LLP**

  
Karen A. Hamlin

May 30, 2024



DarrowEverett<sup>LLP</sup>

Matthew E. Pecoy, Esq.  
mpecoy@darroweverett.com

May 31, 2024

**VIA FEDEX AND E-MAIL TO CTAPPFILINGS@SCCOURTS.ORG**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

Re: *Michael T. Green, et al. v. Georgetown County, et al.*  
Appellate Case No. 2024-000023

Dear Ms. Kitchings:

Enclosed please find this firm's check in the amount of \$50 in payment of the filing fee for Respondents Laine CRE, LLC's and TriStar Land, LLC's Second Motion for Extension of Time, which was electronically filed in the above-referenced appeal on May 31, 2024. Please let me or Attorney Matthew E. Pecoy know if anything further is required.

Sincerely,

Karen A. Hamlin, Paralegal

Enclosures (As Stated)

cc: Cynthia Ranck Person, Esq. (Via Email Only w/o Enclosure)  
F. Patrick Hubbard, Esq. (Via Email Only w/o Enclosure)  
H. Thomas Morgan, Jr. (Via Email Only w/o Enclosure)  
Samuel J. Nesbit, on behalf of the heirs of Will Nesbit, Pro Se (Via US Mail Only, w/o Enclosure)