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Jun 05 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

The Honorable Maite Murphy

Appellate Case No.: 2023-001762

Andrey Gergel and Sonja M. Wyatt Respondents,

v.

Alexander Opoulous, III, Tina B. Opoulous, Sebrina Leigh Jones and Luxury Land and Homes,
Inc. Defendants,

Of whom Tina B. Opoulous, individually, and as personal representative for the Estate of
Alexander Opoulous, III are the Appellants.

**MOTION FOR EXTENSION OF TIME
TO SERVE RECORD ON APPEAL**

Appellant, by and through undersigned counsel, respectfully moves this Honorable Court
for an Order granting an extension of time to serve the Record on Appeal.

The grounds for this motion are that Appellant’s counsel’s office recently had staff
turnover with the paralegal assigned to this file. In addition, Appellant’s counsel was not the
attorney of record in the underlying trial, and collecting and organizing the documents in the
parties’ designations of matter has consumed more time than originally anticipated.

Therefore, Appellant requests a twenty (20) day extension to serve the Record on Appeal
and provide proof of service of the Record on Appeal, making such due on or before July 1, 2024.

Counsel for Respondent consents to this request. See Exhibit A.

FUTERAL & NELSON, LLC



Stephan V. Futeral

SC Bar ID 66427

534 Johnnie Dodds Blvd., Suite 3
Mount Pleasant, South Carolina 29464

(843) 284-5500

sfuteral@charlestonlaw.net

Attorney for Appellants

Dated: June 5, 2024

Exhibit A

Wednesday, June 5, 2024 at 10:38:12 Eastern Daylight Time

Subject: RE: Gergel v Opoulous
Date: Tuesday, June 4, 2024 at 12:03:09 PM Eastern Daylight Time
From: Hamlin O'Kelley
To: Thomas Nelson, Amanda Dowd
CC: Stephan Futeral, Kristina Medlin, Michelle McManigal
Attachments: image001.jpg, image002.jpg, image003.png, image004.png, image005.png, image006.jpg, image007.gif, image008.gif

I'd happily consent to the extension

Amanda can send the items below

G. Hamlin O'Kelley, III
Attorney at Law
Buist Byars & Taylor, LLC
652 Coleman Blvd., Ste 200
Mt. Pleasant, SC 29464
Email: Hamlin.okelley@buistbyars.com
Direct Line: 843.284.1408
Main Office: 843.856.4488



****Please note all funds for closing must be in the form of a *WIRE TRANSFER (NO ACH)*. If you have not received our firm's wiring instructions, please advise and we will get them to you. Thank you****

Email hacking and fraud are on the rise, especially in connection with attempts to misdirect funds. Please call us to and verify wiring instructions with a law firm employee using contact information found by you independently and not from any email. We are not responsible for any wires sent by you to an incorrect bank account.

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From: Thomas Nelson <tnelson@charlestonlaw.net>
Sent: Tuesday, June 4, 2024 11:30 AM
To: Amanda Dowd <amanda.dowd@buistbyars.com>; Hamlin O'Kelley <hamlin.okelley@buistbyars.com>
Cc: Stephan Futeral <sfuteral@charlestonlaw.net>; Kristina Medlin <kmedlin@charlestonlaw.net>; Michelle McManigal <mmcmanigal@charlestonlaw.net>
Subject: Re: Gergel v Opoulous

All,

First, would you consent to a 20-day extension for preparing the Record on Appeal?

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Of whom Tina B. Opoulous, individually, and as personal representative for the Estate of
Alexander Opoulous, III are the Appellants.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to Serve Record on Appeal
by depositing a copy of the same, postage prepaid, via U.S. Mail, addressed to Hamlin O’Kelley,
III, Esquire, at 652 Coleman Boulevard, Suite 200, Mount Pleasant, South Carolina 29464 and by
electronic mail at Hamlin.okelley@buistbyars.com.

Mount Pleasant, South Carolina
June 5, 2024

Kristina L. Medlin
Paralegal to Stephan v. Futeral



Futeral & Nelson LLC

534 Johnnie Dodds Blvd., Suite 202
Mount Pleasant, South Carolina 29464
Tel: 843-284-5500 I Fax: 843-284-5501
charlestonlaw.net

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SC Court of Appeals

June 5, 2024

VIA US MAIL & ELECTRONIC MAIL

The Honorable Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

RE: Andrey Gergel and Sonja M. Wyatt, Respondents v. Alexander Opoulous, III, Tina B. Opoulous, Sebrina Leigh Jones and Luxury Land and Homes, Inc., Defendants, Of whom Tina B. Opoulous, individually, and as personal representative for the Estate of Alexander Opoulous, III are the Appellants.
Appellate Case No.: 2023-001762

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the following, in the above-referenced matter:

1. Motion for Extension of Time to Serve Record on Appeal; and
2. Proof of Service; and
3. A check in the amount of Fifty (\$50.00) Dollars for the filing fee.

Please file the original and return the file-stamped copy to our office, in the enclosed envelope. By copy of this letter, I am serving the same upon opposing counsel, Hamlin O'Kelley, III, Esquire.

Thank you for your assistance in this matter. Should you have any questions or concerns, please do not hesitate to contact our office.

Sincerely,

Kristina L. Medlin
Paralegal to Stephan V. Futeral
kmedlin@charlestonlaw.net

Enclosures

cc: Hamlin O'Kelley, III, Esq. (via email and US Mail)