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**Jun 18 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

Appellate Case No. 2023-001147

APPEAL FROM BEAUFORT COUNTY  
Master in Equity

Marvin H. Dukes, III, Master in  
Equity and Special Circuit Court Judge  
Case No. 2020-CP-07-00977

BOKF Real Estate Holding, LLC

Respondent,

v.

T & S Management, Inc. and  
Turan Strange

Appellants.

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RESPONDENT'S MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF

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COMES NOW Respondent BOKF Real Estate Holding, LLC ("Respondent"), by and through undersigned counsel, pursuant to Rule 263, SCACR, and respectfully requests this Court grant Respondent a thirty (30) day extension in which to file its Initial Brief. Appellants filed their Initial Brief on May 24, 2024. Accordingly, Respondent's Brief is due on June 23, 2024. Respondent respectfully submits an extension of time is appropriate in order to allow Respondent to fully respond to the arguments raised by Appellants. Counsel for Appellants consent to this request.

Respondent respectfully requests the time to file its Initial Brief be extended to July 23, 2024.

RESPECTFULLY SUBMITTED, this 17<sup>th</sup> day of June, 2024.

**NOVIT & SCARMINACH, P.A.**

By:  /s/ Edward M. Kubec

Edward M. Kubec, Esq. (S.C. Bar #76576)

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**Attorneys for Respondent**

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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

Appellate Case No. 2023-001147

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Master in  
Equity and Special Circuit Court Judge  
Case No. 2020-CP-07-00977

BOKF Real Estate Holding, LLC,

Respondent,

v.

T & S Management, Inc. and  
Turan Strange,

Appellants.

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PROOF OF SERVICE

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On this 17<sup>th</sup> day of June 2024, the undersigned did serve Respondent's Motion for Extension of Time to File Initial Brief on counsel for Appellants, by email and placing same in the United States mail to:

Michael W. Mogil, Esq.  
Mogil Law Firm  
2 Corpus Christie Place, Ste. 103  
Hilton Head Island, SC 29928  
mmogil@mogillaw.com

A copy of the service email is attached hereto.

**NOVIT & SCARMINACH, P.A.**

By:  /s/ Emily Schettler  
Emily Schettler, Administrative Assistant  
52 New Orleans Rd., Suite 400  
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**NOVIT &  
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**SC Court of Appeals**

June 17, 2024

**VIA EMAIL AND REGULAR MAIL**

Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
ctappfilings@sccourts.org

RE: BOKF Real Estate Holdings, LLC v. T&S Management, Inc. and Turan Strange  
Appellate Case No. 2023-001147

Dear Ms. Kitchings:

Enclosed please find Respondent's Return Motion for an Extension of Time for File its Initial Brief and Proof of Service in the above-referenced matter.

Kindly file the enclosed and return a clocked copy to the undersigned via return email.

The enclosed documents have been served upon counsel of record today as indicated in the Proof of Service.

Thank you for your assistance with this matter and please contact me if you have any questions.

Very truly yours,

**NOVIT & SCARMINACH, P.A.**

*s/Edward M. Kubec*

Edward M. Kubec

Enclosures

cc: Michael W. Mogil, Esq. (via regular mail and email: mmogil@mogillaw.com)

