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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Steven H. John, Presiding Judge

Case No. 2009-CP-26-10523

Appellate Case No. 2012-213287

RECEIVED
JUL 31 2013
SC Court of Appeals

Elizabeth A. Crotty and James K. Orzech *Appellants,*

v.

Windjammer Village of Little River, South Carolina,
Property Owners' Association, a South Carolina
Eleemosynary Corporation *Respondent.*

**NOTICE OF PETITION AND PETITION FOR AN
EXTENSION OF TIME FOR RESPONDENT TO FILE
ITS INITIAL BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

The Respondent hereby requests an extension of thirty (30) days to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal. The Respondent's Initial Brief and Designation of Matter are due on August 12, 2013; if this Petition is granted, the Respondent's Initial Brief and Designation of Matter will be due on Wednesday, September 11, 2013. On July 2, 2013, in response to a Motion filed by the Respondent, this Honorable Court entered an Order striking pages 1 and 2 and the non-enumerated paragraphs on page 3 of Appellants' Initial Brief, and

required the Appellants to file an amended Initial Brief. The Appellants amended the pages designated by the Order, but also amended their entire Initial Brief to include matters not previously asserted. Further, on July 1, 2013 counsel for the Respondent relocated its office and is experiencing unanticipated administrative problems associated with moving its computer system that has severely impacted the work flow of the Firm. Therefore and accordingly, the Respondent submits that this Petition for Extension is not intended for purposes of delay.

Respectfully submitted,

**WRIGHT, WORLEY, POPE, EKSTER
& MOSS, PLLC**



Kenneth R. Moss, SC Bar # 15520

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Attorneys for Respondent

North Myrtle Beach, South Carolina
July 29, 2013

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PROOF OF SERVICE

I certify that I have served the a copy of the Respondent's Notice of Petition and Petition for an Extension of Time for Respondent to File Its Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above-captioned appeal on the following individuals by United States Mail, with sufficient first-class postage affixed, addressed thereto as follows:

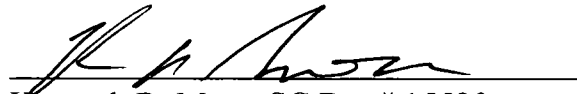
Elizabeth A. Crotty
2121 Brunswick Circle
Little River, SC 29566
Appellant pro se

James K. Orzech
2148 Gamecock Circle
Little River, SC 29566
Appellant pro se

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Respectfully submitted,

**WRIGHT, WORLEY, POPE, EKSTER
& MOSS, PLLC**

A handwritten signature in black ink, appearing to read "K. R. Moss", is written over a horizontal line.

Kenneth R. Moss, SC Bar # 15520

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Attorneys for Respondent

North Myrtle Beach, South Carolina
July 29, 2013

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MICHAEL T. SMITH++
RICK W. SCOTT*
MARTHA HENLEY SLEDGE*
MELANIE C. NICHOLSON ***
KELLY SANSONE-GALLEY***
NAPOLEON B. BAREFOOT, JR. *
D.F. McGOUGAN, JR.
(1921 - 1994)

OTHER OFFICES
TABOR CITY, NC
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*licensed only in NC

**licensed in NC, DC & SC

**DRC-Certified Family Financial Mediator

**licensed in SC & DC and Admitted to the U.S. Supreme Court

***licensed only in SC, Certified Family Court Mediator, Guardian *ad Litem*

July 29, 2013

**VIA CERTIFIED MAIL #7013 0600 0000 0368 1029;
RETURN RECEIPT REQUESTED**

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

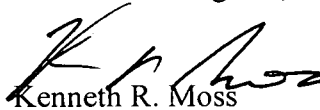
Re: Elizabeth A. Crotty and James K. Orzech vs. Windjammer Village of Little River,
South Carolina, Property Owners' Association
C/A No. 2009-CP-26-10523
Appellate Case No. 2012-213287

Dear Ms. Kitchings:

Please find enclosed for filing one (1) original and six (6) copies of Respondent's NOTICE OF PETITION AND PETITION FOR AN EXTENSION OF TIME FOR RESPONDENT TO FILE ITS INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL. The Proof of Service and filing fee in the amount of \$25.00 are also enclosed.

I have enclosed an additional copy of the Proof of Service and would appreciate you returning a clocked copy to me in the self-addressed, stamped envelope I have provided.

With kindest regards,


Kenneth R. Moss

RECEIVED

JUL 31 2013

SC Court of Appeals

KRM:rb
Enclosures as stated
cc: Elizabeth A. Crotty, *pro se Appellant*
James K. Orzech, *pro se Appellant*