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Jul 03 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

The Honorable Diane Schafer Goodstein
Beaufort County

Trial Court Case No. 2021-CP-07-02165

APPELLATE CASE NO. 2024-000105

Turner's Marina, LLC,

Appellant,

v.

Daniel Hyde, Laura Hyde and

John William Caput,

Respondents.

THIRD MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Respondents, Daniel Hyde and Laura Hyde (collectively "Respondents"), request a third thirty (30) day extension of time for filing and serving their Initial Brief and Designation of Matter (collectively "Initial Brief") to be included in the Record of Appeal in this case due to their need to reference and file confidential material in this appeal. Further, during the final drafting of Respondents' Initial Brief, it came to the attention of Respondents' counsel that the Consent Confidentiality and Protection Order requested by Appellant and consented to by all Respondents, including John William Caput, in Trial Court Case No. 2021-CP-07-02165 ("Confidentiality Order") was never filed and signed by the Circuit Court. This creates a conundrum for Respondents' counsel because the parties' agreed to a confidentiality

order, but that order is not enforceable until entered by the circuit court. Pursuant to the terms of the Confidentiality Order and the Appellate Court Rules, the confidential material referenced by Respondents in their brief requires that they file a Motion to Seal. Thus, Respondents respectfully request additional time to file their Initial Brief so that they can unravel this issue with the confidential documents. The current deadline is July 5, 2024. The requested deadline would be August 5, 2024.

Respectfully submitted,

RUSSELL P. PATTERSON, P.A.

/s/ RUSSELL P. PATTERSON
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Hilton Head Island, South Carolina
July 3, 2024

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date indicated below, counsel for Appellant was served with a copy of the Respondents Daniel Hyde and Laura Hyde's Motion for Extension of Time by mailing a copy of the same via E-mail on the date set forth below. A copy of the E-mail is attached hereto as Exhibit 1.

Thomas C. Taylor
Law Office of Thomas C. Taylor, LLC
P.O. Box 1808
Bluffton, SC 29910
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Respectfully submitted,

/s/ Russell P. Patterson

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*Attorneys for the Respondents Daniel Hyde and
Laura Hyde*

Hilton Head Island, South Carolina
July 3, 2024

EXHIBIT 1

From: [Russell](#)
To: ["Harrison Williams"; tom@thomastaylorlaw.com](#)
Subject: RE: Turner v. Caput Appeal Case No. 2024-000105
Date: Wednesday, July 3, 2024 3:00:00 PM
Attachments: [Hyde 3rd Mtn for Ext. 7-3-24.pdf](#)
[image001.png](#)

Tom and Harrison,

Please find attached a copy of the Hyde's Third Motion for Extension that will be filed with the Appellate Court this afternoon.

Thank you,

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