

**THE STATE OF SOUTH CAROLINA**  
**In The Court of Appeals**

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas  
William H. Seals, Jr., Circuit Court Judge

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Case No. 2021-CP-26-07489  
Appellate Case No. 2024-000144

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City of North Myrtle Beach,  
Appellant,

v.

Sun TRS Ocean Club, LLC, Sun TRS  
Carolina Pines, LLC, and Sun Carolina  
Pines RV, LLC,  
Respondents.

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**CONSENT MOTION AND INCORPORATED MEMORANDUM IN SUPPORT FOR  
LEAVE TO AMEND THE RECORD ON APPEAL AND EXTENSION OF TIME TO  
FILE FINAL BRIEFS**

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Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, the City of North Myrtle Beach (“Appellant”), with the consent of Respondents, hereby moves this Court for leave to amend the previously filed Record on Appeal as well as for an extension of time by which to file Final Briefs. The parties agree there are some materials inadvertently omitted from the Record on Appeal as well as some corrections needed for the Index, such that the parties seek permission from this Court to so supplement and correct the previously filed Record on Appeal. The parties respectfully request thirty (30) additional days to amend the Record on Appeal from

the date this Court grants leave, should the Court so grant. The parties acknowledge that Final Briefs are currently due on October 21, 2024, but given the request for an extension of time by which to amend the Record on Appeal, the parties also respectfully request an extension of time by which to file Final Briefs, such that Final Briefs are due simultaneously with the amendments to the Record on Appeal. Good cause exists for this Consent Motion in order to ensure compliance with Rule 210 of the South Carolina Appellate Court Rules and this is the parties' first request for an amendment and extension of these deadlines.

**WE SO MOVE:**

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**WE SO CONSENT:**

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October 14, 2024

**RECEIVED**

**Oct 14 2024**

**SC Court of Appeals**

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**PROOF OF SERVICE**

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The undersigned certifies serving the Consent Motion and Incorporated Memorandum in Support for Leave to Amend the Record on Appeal and Extension of Time to File Final Briefs by Appellant the City of North Myrtle Beach on the following counsel of record for Respondents via e-mail on October 14, 2024:

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Respectfully submitted,

/s/ Rhett D. Ricard

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October 14, 2024