

RECEIVED

Nov 18 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Supreme Court

Appeal from Charleston County
Court of Common Pleas, Ninth Judicial Circuit
Hon. Judge Bentley D. Price, Circuit Court Judge, Presiding

Appellate Case No. 2024-001738
Opinion No. 6081, filed August 7, 2024

Maybank 2754, LLC.....Respondent,

Versus

Eugene Zurlo, Individually and as co-trustee of the Eugene J. Zurlo Living Trust Dated
December 11, 1997; 1776, LLC; Beach Fenwick, LLC; The Beach Company; Seamon,
Whiteside & Associates, Inc.; Penny Creek Associates, LLC; John Doe and Mary
Roe.....Petitioners.

**MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
THE RESPONDENT’S RETURN TO PETITIONS FOR WRIT OF CERTORARI**

Scarlet B. Moore, #72534
P.O. Box 17615
Greenville, S.C. 29606
(864) 214-5805
(864) 752-0930 (FAX)

Jason M. Tarokh, #72837
Tarokh Law, PLLC
P.O. Box 10827
Tampa, FL 33679
(813) 922-5510
jason@tarokhlaw.com
Attorneys for Respondent

November 18, 2024

NOW INTO COURT, comes the Respondent, Maybank 2754, LLC, who moves this Honorable Supreme Court for an Order permitting the Respondent an extension of time to serve and file the Respondent's Return to the two (2) Petitions for Writ of Certiorari for twenty (20) days for the following reasons, to wit:

The schedule of Respondent's counsel since the filing of the two (2) Petitions for Writ of Certiorari by Petitioners has included multiple court appearances, appellate filings due, and other professional commitments. Further, given that Respondent must file a Return to two (2) separate petitions in this matter, Respondent needs additional time to review the issues raised by the Petitioners.

WHEREFORE, the Respondent prays that this Honorable Court will grant the Respondent an extension to serve and file the Respondent's Return to the two (2) Petitions for Writ of Certiorari for twenty (20) days.

Respectfully Submitted,

s/Scarlet B. Moore

Scarlet B. Moore, #72534
P.O. Box 17615
Greenville, S.C. 29606
(864) 214-5805
(864) 752-0930 (FAX)

Jason M. Tarokh, #72837
Tarokh Law, PLLC
P.O. Box 10827
Tampa, FL 33679
(813) 922-5510
jason@tarokhlaw.com
Attorneys for Respondent

Greenville, South Carolina
November 18, 2024

THE STATE OF SOUTH CAROLINA
In The Supreme Court

Appeal from Charleston County
Court of Common Pleas, Ninth Judicial Circuit
Hon. Judge Bentley D. Price, Circuit Court Judge, Presiding

Appellate Case No. 2024-001738
Opinion No. 6081, filed August 7, 2024

Maybank 2754, LLC.....Respondent,

Versus

Eugene Zurlo, Individually and as co-trustee of the Eugene J. Zurlo Living Trust Dated
December 11, 1997; 1776, LLC; Beach Fenwick, LLC; The Beach Company; Seamon,
Whiteside & Associates, Inc.; Penny Creek Associates, LLC; John Doe and Mary
Roe.....Petitioners.

CERTIFICATE OF SERVICE

I certify that on this date, November 18, 2024, I served a copy of the **Respondent’s Motion for Extension to File and Serve the Return to Petitions for Writ of Certiorari** on opposing counsel to their respective **E-MAIL** addresses, pursuant to the Order of the Supreme Court Appellate Case No. 2020-000447(g)(3).

Rhett D. Ricard – RRicard@maynardnexsen.com

Cheryl D. Shoun - cshoun@nexsenpruet.com

Alexandra Harrington Austin - aaustin@nexsenpruet.com

John Patrick Turner Norris - pnorris@cskl.law

Kent Taylor Stair - kstair@cskl.law

Jordan N. Teich - jteich@cskl.law

Jason S. Smith - js@hellmanyates.com

Brian A. Hellman - bh@hellmanyates.com

J. Rutledge Young, Jr. - jryoung@duffyandyoung.com

Blake Abernethy McKie - bmckie@duffyandyoung.com

Thomas Bacot Pritchard - tpritchard@pnalaw.net

Jason Tarokh – jason@tarokhlaw.com

Jennifer Canaday -- jcanaday@cskl.law

Katie Shaw – kshaw@cskl.law

[Kara S. Grevy – kgravy@duffyandyoung.com](mailto:kgravy@duffyandyoung.com)

[Brian Duffy – bduffy@duffyandyoung.com](mailto:bduffy@duffyandyoung.com)

[Jan Prosen – jprosen@duffyandyoung.com](mailto:jprosen@duffyandyoung.com)

s/Scarlet B. Moore

Scarlet B. Moore, #72534
Attorney for Respondent
P.O. Box 17615
Greenville, S.C. 29606
(864) 214-5805 / (864) 752-0930 (FAX)

Greenville, South Carolina
November 18, 2024.

SCARLET B. MOORE

Attorney at Law

P.O. BOX 17615
GREENVILLE, SC 29606
(864) 214-5805
(864) 752-0930 (FAX)

November 18, 2024

VIA EMAIL FILING:

Patricia A. Howard
Clerk, The Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RE: Maybank 2754, LLC v. Zurlo, et al
Appellate Case No. 2024-001738

Dear Madam Clerk,

Please find enclosed the Respondent's Motion for Extension of Time to Serve and File the Return to Petitions for Writ of Certiorari. I am forwarding a check for the filing cost of \$50.00 by U.S. Mail.

Please let me know if you have questions regarding the enclosed. With kind regards, I remain

Very Truly Yours,

s/Scarlet B. Moore

Scarlet B. Moore, Esq.
Counsel for Respondent

SBM/s

Cc: ***via Email:***

Alexandra Harrington Austin, Esq.
Blake Abernethy McKie, Esq.
Thomas Bacot Pritchard, Esq.
Jason S. Smith, Esq.
Jason M. Tarokh, Esq.

Brian A. Hellman, Esq.
John Patrick Turner Norris, Esq.
Cheryl D. Shoun, Esq.
Kent Taylor Stair, Esq.
Jordan N. Teich, Esq.

J. Rutledge Young, Jr., Esq.
Kara S. Grevy, Esq.
Miriam Peeler
Katie Shaw

Brian Duffy, Esq.
Jan Prosen
Jenifer L. Canaday
Rhett Ricard, Esq.