

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
Carmen T. Mullen, Circuit Court Judge
Trial Court Case No. 2007-CP-07-03027

69986

Appellate Case No. 2012-213629

RECEIVED

SEP 30 2013

SC Court of Appeals

Carolina First Bank, Appellant,

v.

Charles S. McCue, Builder Services Group, Inc., d/b/a Gale Contractor Services,
Pebblethorn Landscape & Design, LLC, Falco, Inc., Distinctive Granite & Marble, Inc.,
Gustavo Angeles, individually and d/b/a Empire Construction, and Rose Hill Plantation
Property Owners Association, Defendants,

of Whom Charles S. McCue is the Respondent.

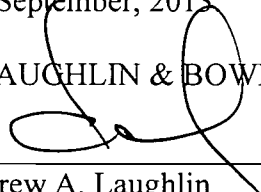
**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE REPLY TO
THE RETURN TO THE MOTION TO DISMISS**

Respondent, Charles S. McCue, by and through his undersigned attorney, hereby
moves before this Court for an Order granting Respondent an extension of ten (10) days to
serve and file his Reply to the Return to the Motion to Dismiss.

Respectfully requested this 26th day of September, 2013

LAUGHLIN & BOWEN, P.C.

By:



Drew A. Laughlin
P.O. Drawer 21119
Hilton Head Island, SC 29925
Ph: (843) 689-5700; Fx (843) 689-9300
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Attorney for Respondent Charles S. McCue

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Property Owners Association, Defendants,

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PROOF OF SERVICE

I, Drew A. Laughlin, counsel for Respondent, Charles S. McCue, certifies that on
this 26 day September, 2013, served the attached Motion for an extension to file Reply to
the Return to the Motion to Dismiss on counsel of record via First Class Mail, postage
prepaid as follows:

T. William McGee, III, Esq.
Erik T. Norton, Esq.
Nelson Mullins Riley & Scarborough LLP
P.O. Box 11070
Columbia, SC 29211

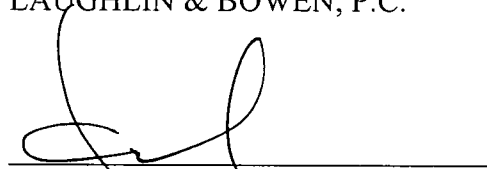
Jonathan E. Halperin, Esq.
Halperin Law Center
P.O. Box 356
Oilville, VA 23129

Carolina First Bank v. McCue
Appellate Case No. 2012-213629
Proof of Service

Page 2

LAUGHLIN & BOWEN, P.C.

By:

A handwritten signature in black ink, appearing to read 'Drew A. Laughlin', is written over a horizontal line. The signature is stylized with loops and a long tail that extends downwards and to the right.

Drew A. Laughlin
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Attorney for Respondent Charles S. McCue

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September 26, 2013

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

Re: Carolina First Bank v. Charles S. McCue
Case No. 2007-CP-07-03027
Appellate Case No.: 2012-213629

Dear Ms. Kitchings:

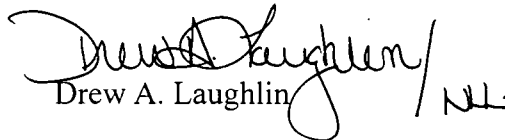
Enclosed please find an original and seven (7) copies of Respondent's Motion for Extension of Time to File Reply to the Return to the Motion to Dismiss and Proof of Service. Please file the originals and return a filed copy to us in the enclosed self-addressed stamped envelope. Also enclosed is our firm's check in the amount of \$25.00 for the applicable filing.

Respondent is seeking an extension while the parties discuss settlement.

Thank you for your courtesies. If you have any questions, please do not hesitate to call me.

Yours truly,

LAUGHLIN & BOWEN, P.C.


Drew A. Laughlin / nll

DAL/nll

Enclosures

cc: Erik T. Norton, Esq. (with enclosures)
T. William McGee, III, Esq. (with enclosures)
Jonathan E. Halperin, Esq. (with enclosures)
Charles S. McCue (with enclosures)

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