

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J. Michael Baxley, Circuit Court Judge

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OCT 11 2013
SC Court of Appeals

Appellate Case No. 2012-213584

Circuit Court Case No. 2009-CP-10-6746

Long Grove at Seaside Farms, LLC; The Beach Company; Gulfstream Construction
Company, Inc., Respondents,

v.

Long Grove Property Owners' Association, Inc.; Vista Realty Partners, LLC; and Long Grove
Vista, LLC;

Of Whom Long Grove Property Owners' Association is Appellant.

Long Grove Property Owners' Association, Inc., Third-Party Plaintiffs,

v.

James, Harwick & Partners, Inc., n/k/a JHP Architecture/Urban Design, P.C; Sam Mayo d/b/a
SCM Construction, Inc.; Essex Engineering Corporation, Third Party Defendants;

Of Whom James, Harwick & Partners, Inc., n/k/a JHP Architecture/Urban
Design, P.C is Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S INITIAL REPLY
BRIEF AND DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON
APPEAL**

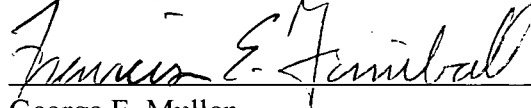
Appellants hereby move the Court for an Order granting an extension until November 12, 2013 to file Appellants' Initial Reply Brief and Designation of Matters to be Included in the Record on Appeal. Respondents requested three thirty (30) day extensions with a final deadline of October 4, 2013. On October 7, 2013, Respondents emailed a copy of their brief dated October 4, 2013 to Appellants. As of the time of filing and serving this motion, Appellants have not yet received the Respondents' Brief via U.S. Mail but expect to receive it shortly. Appellants anticipate filing an Initial Reply Brief which would be due ten (10) days after service of Respondent's Brief. Mr. Grimball and Mr. Mullen have consecutive out-of-state travel plans over the next three weeks that have been scheduled for some time. Due to the timing of the Reply Brief and pre-arranged travel plans, counsel respectfully requests additional time.

Appellants, therefore, request that the deadline for the Initial Reply Brief and Designation of Matters to be Included in the Record on Appeal be extended to Tuesday, November 12, 2013.

Appellants have conferred with Respondents' counsel and have obtained their consent to this request via email correspondence. Appellants further request that the time for filing the Initial Reply Brief and Designation of Matters to be Included in the Record on Appeal be held in abeyance until the Court rules on this Motion.

October 8, 2013

Respectfully Submitted,



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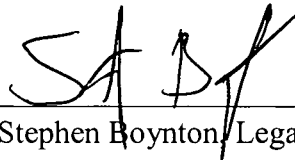
Of Whom James, Harwick & Partners, Inc., n/k/a JHP Architecture/Urban
Design, P.C is Respondent.

CERTIFICATE OF SERVICE

I certify that I have served the Motion For Extension Of Time To File Appellant's Initial Reply
Brief And Designation Of Matters To Be Included In The Record On Appeal on Long Grove at

Seaside Farms, LLC; The Beach Company; Gulfstream Construction Company, Inc. by depositing copies in the United States Mail, postage prepaid on October 8, 2013, addressed to their attorney of record, David J. Parrish, Nexsen Pruet, LLC, P.O. Box 486, Charleston, SC 29402 and that I have served James Harwick & Partners, Inc., n/k/a JHP Architecture/Urban Design, P.C. by depositing a copy of it in the United States Mail, postage prepaid on October 8, 2013, addressed to its attorney of record, Laura F. Locklair, Parker Poe Adams & Bernstein, LLP, 200 Meeting Street, Suite 301, Charleston, SC 29401.

October 8, 2013



Stephen Boynton, Legal Assistant to
Francis E. Grimball
(S.C. Bar Number 002310)
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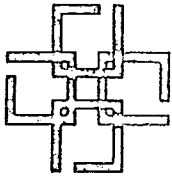
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Calhoun Building
1015 Sumter Street, Suite 200
Columbia, South Carolina 29201-3739

**The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals**

Post Office Box 11629
Columbia, South Carolina 29211



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A T T O R N E Y S

October 8, 2013

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VIA U.S. MAIL AND ELECTRONIC FACSIMILE

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Clerk, South Carolina Court of Appeals
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SC Court of Appeals

RE: Long Grove at Seaside v. Long Grove Property Owners (James,
Harwick & Partners)
Appellate Case No. 2012-213584

Dear Ms. Kitchings:

Enclosed for filing is the Motion For Extension Of Time To File
Appellant's Initial Reply Brief And Designation Of Matters To Be
Included In The Record On Appeal. Also enclosed are the following:

- (1) Proof of Service of the Motion For Extension Of Time To File
Appellant's Initial Reply Brief And Designation Of Matters To
Be Included In The Record of the Appellant on the Respondents;

and

- (2) \$25.00 check for filing fees.

Please return a clocked copy via the enclosed self-addressed, stamped
envelope. Thank you in advance for your help.

George E. Mullen

Robert L. Wylie, IV

Francis E. Grimball

James E. Lady

Allison B. Thompson

Arthur T. Meeder

Amy W. Wates

Andrew J. Toney

Sincerely,

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LETTER TO CLERK OF COURT FOR S.C. COURT OF APPEALS

(843) 853-6200

Attorneys for Appellant

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cc: David J. Parrish
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