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Apr 24 2025

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS
THE HONORABLE ROBERT J. BONDS
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2025-000030
CIVIL ACTION NO. 2021-CP-07-01655

Stanley S. Stroup, as Trustee of the Stanley S. Stroup Revocable Trust dated November 10, 2003; Peter Trager, and Vacation Inn, LLC, each both individually and derivatively,

RESPONDENTS,

versus

Sea Pines South Beach Owners' Association, Inc,

APPELLANT.

MOTION FOR EXTENSION OF TIME

The Initial Brief of Appellant, Sea Pines South Beach Owners' Association, Inc., and Designation of Matter to be Included in the Record on Appeal were originally due on March 28, 2025. At Appellant's request, the Court granted a 30-day extension of time, until April 28, 2025, to serve and file the Appellant's Initial Brief and Designation of Matter. The Appellant respectfully requests the Court to grant a second extension of 30 days, or until Wednesday, May 28, 2025, to serve and file its Initial Brief of Appellant and Designation of Matter.

Counsel for Appellant requests a second extension due to her current workload, including preparation of briefing in the United States Court of Appeals for the Fourth Circuit and the S.C. Supreme Court, as well as a Rule 59(e) motion in the Circuit Court.

Counsel for Appellant has contacted the Respondents' counsel and he consents to this request as indicated in the attached document.

Accordingly, the Appellant, Sea Pines South Beach Owners' Association, Inc., respectfully requests an additional 30-day extension of time in which to serve and file its Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

/s Carmen V. Ganjehsani

Benjamin P. Carlton (S.C. Bar No. 101142)
Carmen V. Ganjehsani (S.C. Bar No. 73515)
Ashwin R. Sanzgiri (S.C. Bar No. 105198)
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
bcarlton@richardsonplowden.com
cganjehsani@richardsonplowden.com
asanzgiri@richardsonplowden.com

James H. Elliott (S.C. Bar No. 13620)
RICHARDSON, PLOWDEN & ROBINSON, PA
235 Magrath Darby Blvd., Ste. 100
Mt. Pleasant, SC 29464
(843) 805-6550
jelliott@richardsonplowden.com
**Attorneys For Appellant
Sea Pines South Beach Owners'
Association, Inc.**

EXHIBIT “A”

From: [Ian Ford](#)
To: [Carmen Ganjehsani](#); [Ainsley Tillman](#)
Cc: [James Elliott](#); [Ashwin Sanzgiri](#); [Ben Carlton](#)
Subject: Re: Stroup et al. v. Sea Pines South Beach Owners' Association, Inc.: Appellate Case No. 2025-000030
Date: Monday, April 21, 2025 2:41:27 PM

Warning: Unusual sender <ian.ford@fordwallace.com>

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Sure, no problem


From: Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>
Sent: Monday, April 21, 2025 2:12 PM
To: Ainsley Tillman <Ainsley.Tillman@fordwallace.com>; Ian Ford <ian.ford@fordwallace.com>
Cc: James Elliott <JElliott@RichardsonPlowden.com>; Ashwin Sanzgiri <ASanzgiri@RichardsonPlowden.com>; Ben Carlton <BCarlton@RichardsonPlowden.com>
Subject: Stroup et al. v. Sea Pines South Beach Owners' Association, Inc.: Appellate Case No. 2025-000030

Ian and Ainsley,

Would you consent to a second 30-day extension of time for us to file our Initial Appellant's Brief and Designations in the above matter?

Thank you so much,

Carmen

HOME	VCARD	LOCATION
	Carmen V. Ganjehsani Shareholder Cganjehsani@RichardsonPlowden.com	Richardson Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 www.RichardsonPlowden.com

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CERTIFICATE OF SERVICE

I, the undersigned, attorney for Appellant, Sea Pines South Beach Owners' Association, Inc., do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated April 24, 2025, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Amended Order dated April 24, 2024, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

Ian Scott Ford (S.C. Bar No. 12463)
Ainsley Fisher Tillman (S.C. Bar No. 70551)
FORD WALLACE THOMSON LLC
715 King Street
Charleston, SC 29403
(843) 608-1234
ian.ford@fordwallace.com
ainsley.tillman@fordwallace.com
Attorneys For Respondents
Stanley S. Stroup, as Trustee of the
Stanley S. Stroup Revocable Trust dated November 10,
2003; Peter Trager, and Vacation Inn, LLC,
each both individually and derivatively

A copy of the sent email is enclosed with this Certificate of Service.


/s Carmen V. Ganjehsani
Carmen V. Ganjehsani
S.C. Bar No. 73515
RICHARDSON, PLOWDEN & ROBINSON, PA
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Attorneys For Appellant
Sea Pines South Beach Owners' Association, Inc.

Date: April 24, 2025.

From: [Carmen Ganjehsani](#)
To: ["Ainsley Tillman"; "ian.ford@fordwallace.com"](#)
Cc: [James Elliott](#); [Ben Carlton](#); [Ashwin Sanzgiri](#)
Subject: Appellate Case No. 2025-00030 Stroup v. Sea Pines South Beach Owners Ass'n
Date: Thursday, April 24, 2025 11:25:00 AM
Attachments: [2025-00030 Stroup v. Sea Pines South Beach Owners Ass'n \(Mtn for 2nd Ex of Time\) \(3719506\).pdf](#)

Pursuant to the Supreme Court's Order dated April 24, 2024, please find served upon you Motion for an Extension of Time on behalf of Sea Pines South Beach Owners' Association, Inc.

Thank you,
Carmen Ganjehsani

HOME	VCARD	LOCATION
	Carmen V. Ganjehsani Shareholder Cganjehsani@RichardsonPlowden.com	Richardson Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 www.RichardsonPlowden.com

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COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202
1900 Barnwell St., Columbia, SC 29201 P 803-771-4400 F 803-779-0016

MYRTLE BEACH P.O. Box 3646 • Myrtle Beach, SC 29578
2103 Farlow St., Suite B, Myrtle Beach, SC 29577 P 843-448-1008 F 843-448-1533

CHARLESTON P.O. Box 21203 • Charleston, SC 29413
235 Magrath Darby Blvd., Mount Pleasant, SC 29464 P 843-805-6550 F 843-805-6599

www.RichardsonPlowden.com

REPLY TO: Columbia
E-Mail: cganjehsani@richardsonplowden.com
Direct Dial: (803) 253-8692

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Via e-mail (ctappfilings@sccourts.org) and hand delivery

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Stanley S. Stroup et al. v. Sea Pines South Beach Owners' Association, Inc.
Appellate Case No. 2025-000030
Civil Action No. 2021-CP-07-01655
RPR File No.: 000101-02986

Dear Ms. Kitchings:

Enclosed for filing is the Motion for an Extension of Time to file the Initial Appellant's Brief and Designation of Matter to be Included in the Record on Appeal on behalf of Appellant Sea Pines South Beach Owners' Association, Inc. in the above-referenced case, along with our Certificate of Service. We are also filing this Motion electronically with the Court of Appeals via e-mail at ctappfilings@sccourts.org pursuant to Section (b)(2) of the Supreme Court's April 24, 2024 Order.

Also enclosed is our firm's check in the amount of \$50.00 for the filing fee in this matter.

We have served this Motion for Extension on counsel of record upon their primary email addresses listed in the Attorney Information System.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely,

/s Carmen V. Ganjehsani

Carmen V. Ganjehsani

Encs.

The Honorable Jenny Abbott Kitchings

April 24, 2025

Page 2

cc: Ian Scott Ford (ian.ford@fordwallace.com)
Ainsley Fisher Tillman (ainsley.tillman@fordwallace.com)
James H. Elliott (jelliott@richardsonplowden.com)
Benjamin P. Carlton (bcarlton@richardsonplowden.com)
Ashwin R. Sanzgiri (asanzgiri@richardsonplowden.com)