



RACHEL FERGUSON BAILEY, ESQUIRE  
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REPLY TO CHARLESTON OFFICE

June 4, 2025

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JUN 04 2025

SC Court of Appeals

104884

*Via Hand Delivery*

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

RE: Filing Fee: The Vanderham Family Living Trust, et al. v. City of Isle of Palms, et al, Case No. 2025-000636

Dear Ms. Kitchings:

On June 2, 2025, we filed, via email, a motion for extension of time to file our initial brief. The court granted the motion the same day. As indicated in my June 2, 2025, email, pursuant to Section (d)(1) of the South Carolina's Supreme Court's April 24, 2024, amended order, a filing fee of \$50 is enclosed, as well as a copy of the filed motion and order.

Sincerely,

Rachel Ferguson, Esq.

**COLUMBIA**  
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**Jun 02 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2025-000636

The Vanderham Family Living  
Trust, Villa Las Palmas LLC,  
Scout Beach House LLC, Amy  
Oakes, MMH Property Holding  
LLC, and Black Ice Venture, II,

Appellants,

v.

City of Isle of Palms and South  
Carolina Department of Environmental  
Services,

Respondents.

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**JUN 04 2025**

**SC Court of Appeals**

**APPELLANTS' CONSENT MOTION  
FOR AN EXTENSION OF TIME TO  
FILE APPELLANTS' INITIAL BRIEF**

Pursuant to Rule 263, SCACR, Appellants, The Vanderham Family Living Trust, Villa Las Palmas LLC, Scout Beach House LLC, Amy Oakes, MMH Property Holding LLC, and Black Ice Venture, II, request a 30-day extension to file their initial brief. The current deadline is Thursday, June 5, 2025, and the proposed extended deadline would be Monday, July 7, 2025. Counsel for both Respondents consent to Appellants' request. This is Appellants' first extension request.

Respectfully submitted,

/s/ Rachel Ferguson

Gerry M. Finkel (S.C. Bar #2013)

Rachel Ferguson (S.C. Bar #75224)

Post Office Box 71727

North Charleston, South Carolina 29415

Phone: (803) 765-2935

Attorneys for Appellants

June 2, 2025

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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
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Trust, Villa Las Palmas LLC,  
Scout Beach House LLC, Amy  
Oakes, MMH Property Holding  
LLC, and Black Ice Venture, II,

Appellants,

v.

City of Isle of Palms and South  
Carolina Department of Environmental  
Services,

Respondents.

**PROOF OF SERVICE**

Pursuant to Rule 262, SCACR, and Section (d)(1) of the South Carolina's Supreme Court's April 24, 2024, amended order, I certify that I have served Appellants' Consent Motion for an Extension of Time to File Appellants' Initial Brief in the above-captioned upon all counsel of record by email on June 2, 2025, to the lawyer's primary e-mail address listed in the Attorney Information System (AIS):

Stafford McQuillin, III, Esquire  
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Attorney for Respondent Isle of Palms

Sarah Spruill, Esquire  
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/s/ Rachel Ferguson  
Rachel Ferguson (S.C. Bar #75224)  
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June 2, 2025

# The South Carolina Court of Appeals

The Vanderham Family Living Trust, Villa Las Palmas,  
LLC, Scout Beach House, LLC, Amy Oakes, MMH  
Property Holding, LLC and Black Ice Venture, II,  
Appellants,

v.

City of Isle of Palms and South Carolina Department of  
Environmental Services, Respondents.

Appellate Case No. 2025-000636

The Honorable Mikell R. Scarborough  
Charleston County  
Trial Court Case No. 2024CP1001327

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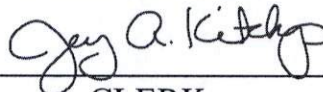
## ORDER

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The time for serving and filing the appellants' initial brief and designation of matter is hereby extended until July 7, 2025.

FOR THE COURT

BY



CLERK

Columbia, South Carolina

**FILED**  
**Jun 02 2025**

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cc:

Rachel L Ferguson, Esquire

Gerald M. Finkel, Esquire

Timothy Lee Calderwood, Esquire

Charles A. Krawczyk, Esquire  
Johnny J. Stewart, Jr., Esquire  
Sarah P. Spruill, Esquire  
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