

MOTION FOR EXTENSION OF TIME

THE STATE OF SOUTH CAROLINA
The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes III, Circuit Court Judge

Appellant Case No. 2025-001031
Case No. 2021-CP-07-01085

R.V. Resort and Yacht Club
Owners' Association, Inc.,
Securitas Services, Inc., Mike
Morales, and Sunset, Inc.,

Respondent,

v.

Turner's Marina, LLC,

Appellant.

Appellant respectfully requests the Court's permission for an extension of time to file the Initial Brief outside of the filing deadlines set by Rules 207 and 208 of the South Carolina Appellate Court Rules. In support of this Motion, Appellant states as follows:

1. The Appellate timely filed a Notice of Appeal in the above-referenced matter.
2. The Appellant requested the transcripts necessary to prepare the Initial Brief. To date, only one of the two transcripts requested has been received.
3. Attached is the confirmation email.
4. The outstanding transcript is essential for the preparation of the Initial Brief.
5. Appellant respectfully requests an extension of thirty (30) days from the date the final transcript is received, or such other time as the Court deems appropriate, in which to file the Initial Brief.

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Court of Appeals

Wherefore, Appellant respectfully requests that the Court grant this Motion for Extension of Time and issue an Order extending the deadline to file the Initial Brief until thirty (30) days after the outstanding transcript is received.

July 31, 2025.

Alford Law Firm, LLC
s/Gregory M. Alford
Gregory M. Alford
Post Office Box 8008
Hilton Head Island, SC 29938
(843)842-5500
Attorney For Appellant

Gregg Alford <gregg@alfordlawsc.com>

Mon, Jun 30, 2025 at 1:52 PM

To: "Fisher, Bobbi" <bfisher@sccourts.org>, Victoria Gill <general@alfordlawsc.com>

Cc: Transcripts <transcripts@sccourts.org>

Good afternoon,

This email is to confirm the order for the transcript of the January 21, 2025, hearing before Judge Dukes. We are requesting **Regular Delivery**.

Please let me know if any additional information is required. Thank you.

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[Quoted text hidden]

Fisher, Bobbi <bfisher@sccourts.org>

Sun, Jul 27, 2025 at 10:06 PM

To: Gregg Alford <gregg@alfordlawsc.com>, Victoria Gill <general@alfordlawsc.com>

Dear Mr. Alford--

There were two different cases heard during this hearing with all counsel. I think the first one was the #989 case and then there were motions heard on the #1085 case. Did you want the transcript to include the #989 case or just start it where they start speaking about the #1085 case only?

Kind Regards,

Bobbi Fisher, RPR

*Ms. Bobbi Fisher, Stenographer
South Carolina Official Court Reporter III (Horry County)
NCRA Registered Professional Reporter (RPR)
DCRP Transcription Team*

The message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is privileged, confidential or otherwise exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message. If you have received this message in error, please contact me immediately and delete all copies of this message.

From: Gregg Alford <gregg@alfordlawsc.com>
Sent: Monday, June 30, 2025 1:52 PM
To: Fisher, Bobbi <bfisher@sccourts.org>; Victoria Gill <general@alfordlawsc.com>
Cc: Transcripts <transcripts@sccourts.org>
Subject: Re: **NEW** PLEASE CONFIRM: TRANSCRIPT REQ: (1/21/25) Turners Marina LLC v. R.V. Resort and Yacht Club

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. *******

[Quoted text hidden]

Victoria Gill <general@alfordlawsc.com>
To: "Fisher, Bobbi" <bfisher@sccourts.org>
Cc: Gregg Alford <gregg@alfordlawsc.com>

Mon, Jul 28, 2025 at 2:25 PM

Good afternoon,

We only need the transcript to begin where they start discussing case#01085. Thank you!

[Quoted text hidden]

[Quoted text hidden]

Fisher, Bobbi <bfisher@sccourts.org>
To: Victoria Gill <general@alfordlawsc.com>

Mon, Jul 28, 2025 at 2:27 PM

Great! Thanks so much! I'll work on getting that completed ASAP.

Kind Regards,

Bobbi Fisher, RPR

Ms. Bobbi Fisher, Stenographer
South Carolina Official Court Reporter III (Horry County)
NCRA Registered Professional Reporter (RPR)
DCRP Transcription Team

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From: Victoria Gill <general@alfordlawsc.com>

Sent: Monday, July 28, 2025 2:25 PM

To: Fisher, Bobbi <bfisher@sccourts.org>

Cc: Gregg Alford <gregg@alfordlawsc.com>

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[Quoted text hidden]

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GREGORY M. ALFORD*
THOMAS E. WILLIAMS†

*Also member Georgia Bar
† Of Counsel

(NOT FOR CONFIDENTIAL COMMUNICATIONS)

July 31, 2025

Via US First Class Mail

Catherine S. Harrison
Chief Deputy Clerk
The South Carolina Court of Appeals
1220 Senate Street, Suite 200
Columbia, SC 29201

Re: Turner's Marina, LLC, v. R.V. Resort and Yacht Club Owners' Association, Inc.
Appellate Case No. 2025-001031
Our Client: Turner's Marina, LLC

Dear Ms. Harrison,

Enclosed please find our *Motion for Extension of Time*, in connection with the above-referenced matter, along with a check from our firm in the amount of Fifty and 00/100 (\$50.00) Dollars as the Filing Fee for the above-named case.

Should you have any questions or concerns, please feel free to contact our office.

With kindest regards, I am,

Sincerely,
ALFORD LAW FIRM, LLC



Gregory M. Alford

Cc: via email: Tom Taylor, Esquire
Christopher Lizzi, Esquire
Russell Patterson, Esquire
The South Carolina Court of Appeals

ALFORD LAW FIRM

Post Office Drawer 8008
Hilton Head Island, SC 29938

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Catherine S. Harrison
Chief Deputy Clerk
The South Carolina Court of Appeals
1220 Senate Street, Suite 200
Columbia, SC 29201

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