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Nov 06 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. 2025-000384
CIVIL ACTION NO. 2022-CP-07-2483

Roland Bernardon and Louise Bernardon,

APPELLANTS,

versus

Mark Damiano, Ellery K. Damiano, Sea Pines Real Estate at the Beach Club,
Robert Reichel, and John McMahan,

DEFENDANTS,

of which Mark Damiano, Ellery K. Damiano, Sea Pines Real Estate at the
Beach Club, and Robert Reichel are the

RESPONDENTS.

MOTION FOR EXTENSION OF TIME

The Initial Brief of Respondents, Mark Damiano, Ellery K. Damiano, Sea Pines Real Estate at the Beach Club, and Robert Reichel, and Designation of Matter to be Included in the Record on Appeal were originally due on October 8, 2025. At Respondents' request, the Court granted a 30-day extension of time, until November 7, 2025, to serve and file the Respondents' Initial Brief and Designation of Matter. The Respondents respectfully request the Court to grant a second extension of 14 days, or

until Friday, November 21, 2025, to serve and file its Initial Brief of Respondents and Designation of Matter.

Counsel for Respondents requests a second extension due to her current workload, including preparation for a South Carolina Supreme Court oral argument, briefing before the United States Court of Appeals for the Fourth Circuit, preparation of reports as a member of the Committee on Character and Fitness, and preparation for (30)(b)(6) depositions.

Counsel for Respondents has contacted the Appellants' counsel for consent, but Respondents' counsel has not received consent as of the time of filing this motion.

Accordingly, the Respondents request an additional 14-day extension of time in which to serve and file their Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

/s/ Carmen V. Ganjehsani

David A. Anderson (S.C. Bar No. 11550)
Carmen V. Ganjehsani (S.C. Bar No. 73515)
Hunter W. Adams (S.C. Bar No. 103526)
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Attorneys For Respondents

**Mark Damiano, Ellery K. Damiano,
Sea Pines Real Estate at the Beach Club,
and Robert Reichel**

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CERTIFICATE OF SERVICE

I, the undersigned, attorney for Respondents, Mark Damiano, Ellery K. Damiano, Sea Pines Real Estate at the Beach Club, and Robert Reichel, do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated November 6, 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):

Michael W. Mogil
Mogil Law Firm
PO Box 5925
Hilton Head Island, SC 2993
mmogil@mogillaw.com

Thomas J. Finn
Finn Law Firm, PC
PO Box 6003
Hilton Head Island, SC 29938
thomas@finnlawfirmpc.com
Attorneys for Appellants

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 Respondents

Date: November 6, 2025.

From: [Carmen Ganjehsani](#)
To: "mmogil@mogillaw.com"; "thomas@finnlawfirmpc.com"
Cc: [David Anderson](#); [Hunter Adams](#)
Subject: 2025-00384 Bernardon v. Damiano
Date: Thursday, November 6, 2025 3:19:00 PM
Attachments: [2025-000384 Bernardon v. Damiano Mtn for Ex \(3944732\).pdf](#)

Please find served upon you the Motion for an Extension of Time on behalf of Respondents.

Thank you,
Carmen Ganjehsani

HOME	VCARD	LOCATION
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November 6, 2025

Filed 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

RECEIVED
Nov 06 2025
SC Court of Appeals

Re: Roland Bernardon v. Mark Damiano
Appellate Case No. 2025-000384
RPR File No.: 010203-00001

Dear Ms. Kitchings:

Enclosed for filing is the Motion for an Extension of Time to file the Initial Respondents' Brief and Designation of Matter to be Included in the Record on Appeal on behalf of Respondents Sea Pines Real Estate at the Beach Club, Ellery K. Damiano, Mark Damiano, and Robert Reichel 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

November 6, 2025

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cc: Mike W. Mogil (mmogil@mogillaw.com)
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