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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
John M. Milling, Special Referee

Case No. 2009-CP-26-10053

RECEIVED
DEC 23 2013
SC Court of Appeals

Harleysville Group Insurance, a Pennsylvania corporation, ... Appellant/Respondent,

v.

Heritage Communities, Inc., a South Carolina corporation;
Heritage Riverwalk, a South Carolina corporation;
Buildstar Corp., a South Carolina corporation; Riverwalk at
Arrowhead Country Club Horizontal Property Regime;
Riverwalk at Arrowhead Country Club Property Owners
Assoc., Inc., a South Carolina Corporation; National
Surety Corp.; and Tony L. Pope and Lynn Pope,
individually and representing as a class all unit owners at
Riverwalk at Arrowhead Country Club Horizontal Property
Regime,

Defendants,

Of whom Heritage Communities, Inc., a South Carolina
corporation; Heritage Riverwalk, a South Carolina
corporation; Buildstar Corp., a South Carolina corporation;
National Surety Corp.; and Tony L. Pope and Lynn Pope,
individually and representing as a class all unit owners at
Riverwalk at Arrowhead Country Club Horizontal Property
Regime are.....

Respondents,

And Riverwalk at Arrowhead Country Club Horizontal
Property Regime and Riverwalk at Arrowhead Country
Club Property Owners Assoc., Inc., are Respondents/Appellants.

**Joint Motion for Extension of Time
in which to File Reply Briefs**

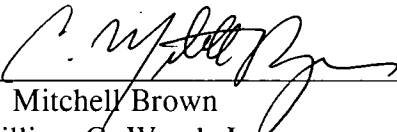
Appellant/Respondent Harleysville Group Insurance (“Harleysville”) and
Respondents/Appellants Riverwalk at Arrowhead Country Club Horizontal Property
Regime and Riverwalk at Arrowhead Country Club Property Owners Assoc., Inc.
(collectively “the Property Owners”) hereby jointly request a 30-day extension to file

their initial Reply Briefs. This request is made due to other case demands, holiday travel, and to allow for time needed to prepare and file the parties initial Reply Briefs. Both parties consent to this 30-day extension (see attached) and no prejudice will be caused to either party by extension.

The current due date for the parties' initial Reply Briefs is December 30, 2013. With a 30-day extension, the Reply Briefs would be due on January 29, 2014. The parties further request that the current deadline be held in abeyance until this Court issues an order on this motion.

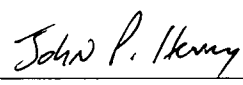
Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 
C. Mitchell Brown
William C. Wood, Jr.
A. Mattison Bogan
Miles E. Coleman
Post Office Box 11070
Columbia, SC 29211
(803) 799-2000

Robert C. Calamari
Post Office Box 3939
Myrtle Beach, SC 29577
(843) 448-3500
Attorneys for Appellant/Respondent Harleysville

THOMPSON & HENRY

By:  *by C. Mitchell Brown w/ permission*
John P. Henry
Philip C. Thompson
Post Office Box 1740
Conway, SC 29528
(843) 248-5741
Attorneys for Respondents/Appellants

December 23, 2013

Lisa Whitehurst

From: Mitch Brown
Sent: Friday, December 20, 2013 2:23 PM
To: Lisa Whitehurst
Subject: FW: Reply briefs in Magnolia North and in Riverwalk

From: Pat Henry [<mailto:PHenry@thompsonlaw.com>]
Sent: Thursday, December 19, 2013 6:48 AM
To: Mitch Brown
Subject: RE: Reply briefs in Magnolia North and in Riverwalk

My thoughts exactly. Why don't u do a joint motion and sign my name. Merry Christmas

Sent from my Verizon Wireless 4G LTE Smartphone

----- Original message -----

From: Mitch Brown <mitch.brown@nelsonmullins.com>
Date: 12/19/2013 12:02 AM (GMT-05:00)
To: Pat Henry <PHenry@thompsonlaw.com>
Subject: Reply briefs in Magnolia North and in Riverwalk

Hi Pat:

Would you consent, due to the holidays and other deadlines, to a 30 day extension of time for all parties to file Reply briefs? Thank you for your kind consideration of this request.

Mitch

Confidentiality Notice

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure.

If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone (800-237-2000) or reply to this e-mail and delete all copies of this message.

To ensure compliance with the requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including the attachments) is not intended or written to be used, for the purpose of (a) avoiding penalties under the Internal Revenue Code or (b) promoting, marketing or recommending to another party any transaction or tax-related matter[s]. To provide you with a communication that could be used to avoid penalties under the Internal Revenue Code will necessarily entail additional investigations, analysis and conclusions on our part.

Lisa Whitehurst

From: Mitch Brown
Sent: Friday, December 20, 2013 6:04 PM
To: Lisa Whitehurst
Subject: FW: Magnolia North and Riverwalk appeals

Here is the other consent

From: Laura Evans [<mailto:Laura.Evans@smithmoorelaw.com>]
Sent: Friday, December 20, 2013 2:44 PM
To: Mitch Brown
Subject: Re: Magnolia North and Riverwalk appeals.

We consent

On Dec 20, 2013, at 2:15 PM, "Mitch Brown" <mitch.brown@nelsonmullins.com> wrote:

Hi Laura:

Pat Henry and I are jointly seeking 30 day extensions to file our respective Reply briefs. Please reply to this email with your client's consent if you would so we can represent to the Court of Appeals that the motion is fully consented to. Thanks. Happy holidays.

Mitch

Confidentiality Notice

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure.

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To ensure compliance with the requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including the attachments) is not intended or written to be used, for the purpose of (a) avoiding penalties under the Internal Revenue Code or (b) promoting, marketing or recommending to another party any transaction or tax-related matter[s]. To provide you with a communication that could be used to avoid penalties under the Internal Revenue Code will necessarily entail additional investigations, analysis and conclusions on our part.

IRS CIRCULAR 230 NOTICE: To ensure compliance with the requirements of IRS Circular 230, we inform you that any U.S. tax advice contained in this communication or attachment hereto is not intended or written to be used and cannot be used for the purpose of avoiding penalties under the Internal Revenue Code or for promoting, marketing or recommending to another party any transaction or matter addressed in this communication or attachment.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
John M. Milling, Special Referee

Case No. 2009-CP-26-10053
Appellate Case No. 2013-001291

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Harleysville Group Insurance, a Pennsylvania
corporation, Appellant/Respondent,

v.

Heritage Communities, Inc., a South Carolina
corporation; Heritage Riverwalk, a South Carolina
corporation; Buildstar Corporation, a South
Carolina corporation; Riverwalk at Arrowhead
Country Club Horizontal Property Regime;
Riverwalk at Arrowhead Country Club Property
Owners Association, Inc., a South Carolina
corporation; National Surety Corp., and Tony L.
Pope and Lynn Pope, individually and representing
as a class all unit owners at Riverwalk at
Arrowhead Country Club Horizontal Property
Regime, Defendants.

Of whom Heritage Communities, Inc., a South
Carolina corporation; Heritage Riverwalk, a South
Carolina corporation; Buildstar Corporation, a
South Carolina corporation; National Surety Corp.,
and Tony L. Pope and Lynn Pope, individually and
representing as a class all unit owners at Riverwalk
at Arrowhead Country Club Horizontal Property
Regime, Respondents,

And Riverwalk at Arrowhead Country Club
Horizontal Property Regime; Riverwalk at
Arrowhead Country Club Property Owners
Association, Inc. are, Respondents/Appellants.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellant/Respondent, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

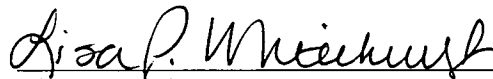
Joint Motion for Extension of Time in which to File Reply Briefs

Counsel Served:

John P. Henry, Esquire
Philip C. Thompson, Esquire
Thompson & Henry
1300 Second Avenue, 3rd Floor
Conway, SC 29528

Laura Johnson Evans, Esquire
Smith Moore Leatherwood, LLP
25 Calhoun Street, Suite 250
Charleston, SC 29401

Karin McCarthy, Esquire
Rivkin Radler
926 RXR Plaza
Uniondale, NY 11556



Lisa P. Whitehurst
Administrative Assistant

December 23, 2013

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP
Attorneys and Counselors at Law
1320 Main Street / 17th Floor / Columbia, SC 29201
Tel: 803.799.2000 Fax: 803.255.5916
www.nelsonmullins.com

C. Mitchell Brown
Tel: 803.255.9595
Fax: 803.255.9025
mitch.brown@nelsonmullins.com

December 23, 2013

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201

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DEC 23 2013
SC Court of Appeals

RE: Harleysville Group Insurance v. Heritage Communities, Inc. (Riverwalk)
C.A. No.: 2009-CP-26-10053
Appellate Case No. 2013-001291
Our File No.: 00470.01581

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of a Joint Motion for Extension of Time in which to File Reply Briefs in the above-captioned matter. We would ask that you file the original and return a clocked-in copy to us via our courier. Also enclosed is our Firm check in the amount of \$25.00 as the required filing fee.

With kind regards, I remain

Sincerely yours,



C. Mitchell Brown

CMB:lpw
Enclosure

cc: John P. Henry, Esquire
Laura Johnson Evans, Esquire
Karin McCarthy, Esquire