

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

71130

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

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.

**Appellant/Respondent's Motion for Extension
of Page Limits—Consent Granted**

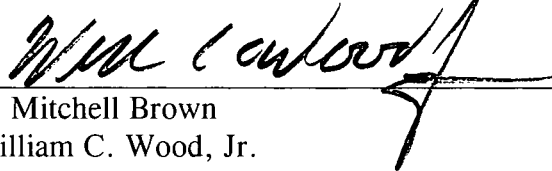
Appellant/Respondent Harleysville Group Insurance (“Harleysville”) hereby requests the right to expand the pages for its Reply brief to 35 pages. This request is due to the number of issues involved in this appeal. Harleysville may not ultimately

need all of these additional pages. Counsel for Respondents/Appellants consents to this request (see attached).

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By:


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Attorneys for Appellant/Respondent Harleysville

January 30, 2014
Columbia, South Carolina

Exhibit

Miles Coleman

Subject: Re: Reply brief page limits in Magnolia North and Riverwalk appeal matters

From: Laura Evans [<mailto:Laura.Evans@smithmoorelaw.com>]

Sent: Tuesday, January 28, 2014 05:02 PM

To: Mitch Brown

Subject: Re: Reply brief page limits in Magnolia North and Riverwalk appeal matters

No problem

From: Pat Henry [<mailto:PHenry@thompsonlaw.com>]

Sent: Tuesday, January 28, 2014 4:22 PM

To: Mitch Brown

Subject: RE: Reply brief page limits in Magnolia North and Riverwalk appeal matters

Sure

Sent from my Verizon Wireless 4G LTE Smartphone

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

From: Mitch Brown

Date: 01/28/2014 4:03 PM (GMT-05:00)

To: Pat Henry, Laura Evans

Subject: Reply brief page limits in Magnolia North and Riverwalk appeal matters

It appears we may need to exceed these by some pages – in one it appears we may need 32 and in another slightly more. I will certainly promise no more than 35 as a maximum, but will strive for less. Do you consent to a motion in this regard? Thank you.

Mitch

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Case No. 2009-CP-26-10053
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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:

Appellant/Respondent's Motion for Extension of Page Limits—
Consent Granted

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January 20, 2014

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January 30, 2014

RECEIVED

JAN 30 2014

SC Court of Appeals

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

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 one copy of the Initial Reply Brief of the Appellant/Respondent and the original and seven copies of Appellant/Respondent's Motion for Extension of Page Limits—Consent Granted in regard to the above-referenced matter. We would ask that you file the originals and return clocked-in copies to us via our courier. Enclosed is our check in the amount of \$25.00 as the required filing fee for the motion.

Sincerely,

William C. Wood, Jr. (lpw)
William C. Wood, Jr.

WCWJR:lpw

Enclosures

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