

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

71129

Case No. 2009-CP-26-11862
Appellate Case No. 2013-001281

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

v.

Heritage Communities, Inc., a South Carolina corporation;
Heritage Magnolia North, Inc., a South Carolina corporation;
Buildstar Corp., a South Carolina corporation; Magnolia
North Horizontal Property Regime; Magnolia North Property
Owners Assoc., Inc., a South Carolina corporation; and
National Surety Corp.,.....

Defendants,

Of whom Heritage Communities, Inc., a South Carolina
corporation; Heritage Magnolia North, Inc., a South Carolina
corporation; Buildstar Corp., a South Carolina corporation;
and National Surety Corp. are

Respondents,

And Magnolia North Horizontal Property Regime and
Magnolia North Property Owners Assoc., Inc., a South
Carolina corporation 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).

SIGNATURE PAGE ATTACHED

RECEIVED

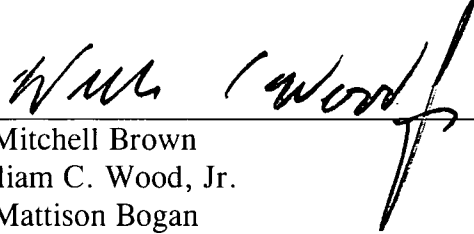
JAN 30 2014

SC Court of Appeals

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

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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

Confidentiality Notice

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Court of Common Pleas
John M. Milling, Special Referee

Case No. 2009-CP-26-11862
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Harleysville Group Insurance, a Pennsylvania
corporation,..... Appellant/Respondent,

v.

Heritage Communities, Inc., a South Carolina
corporation; Heritage Magnolia North, Inc., a
South Carolina corporation; Buildstar Corporation,
a South Carolina corporation; Magnolia North
Horizontal Property Regime; Magnolia North
Property Owners Association, Inc., a South
Carolina corporation, and National Surety Corp.,..... Defendants.

Of whom Heritage Communities, Inc., a South
Carolina corporation; Heritage Magnolia North,
Inc., a South Carolina corporation; and National
Surety Corp. are Respondents,

And Magnolia North Horizontal Property Regime
and Magnolia North Property Owners Assoc., Inc.,
a South Carolina corporation are Respondents/Appellants.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson
Mullins Riley & Scarborough LLP, attorneys for Appellant, 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 30, 2014

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January 30, 2014

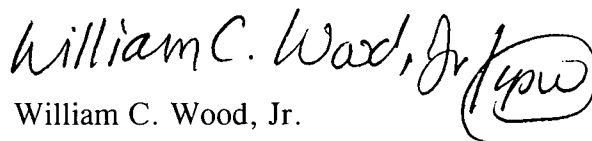
The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201.

RE: Harleysville Group Insurance v. Heritage Communities, Inc., a South Carolina Corporation; Heritage Magnolia North Inc., a South Carolina Corporation; et al.
C.A. No.: 2009-CP-26-11862
Appellate Case No. 2013-001281
Our File No.: 00470/01580

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.

WCWJR:lpw
Enclosures

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

RECEIVED

JAN 30 2014

SC Court of Appeals