

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS
CARMEN T. MULLEN, JUDGE

CASE NO. 2010-CP-07-04328

APPELLATE CASE NO. 2013-000920

12297

RECEIVED

MAY 27 2014

SC Court of Appeals

Coral Resorts, LLC and Coral Holdings, LLC.....Respondents

vs.

Ted Morris, Lorraine Morris, Coastal Timeshare Creations, LLC d/b/a Coastal Visitors
Center and Coastal Activities, Morr Marketing Enterprises, Inc., Tom Page and Scott
McCoy.....Appellants

MOTION

OF THE APPELLANTS

TO REINSTATE THE APPEAL

TO THE HONORABLE JUDGES OF THE COURT OF APPEALS FOR THE
STATE OF SOUTH CAROLINA:

THE APPELLANTS, TED MORRIS, LORRAINE MORRIS, COASTAL
TIMESHARE CREATIONS, LLC, D/B/A COASTAL VISITORS CENTER AND
COASTAL ACTIVITIES, MORR MARKETING ENTERPRISES, INC., TOM PAGE,
AND SCOTT MCCOY, DO HEREBY RESPECTFULLY FILE THIS MOTION TO
REINSTATE THE APPEAL AND, AS A BASIS THEREFORE, RESPECTFULLY
REPRESENT UNTO THE COURT AS FOLLOWS, TO WIT:

On a former day, the Court entered an Order Dismissing the Appeal, which Order also provided that, in the event that the Case has not been Settled, within Ninety (90) Days from the date of the Order, the Court would reinstate the Appeal, upon request. The Parties are continuing to negotiate and have, in essence, reached an Agreement for Settlement; however, as of this point in time, the Final Documents have not been executed. Therefore, if for some reason, the Final Documents are not executed, the Appellants desire to be protected, relative to this Appeal. As such, the Appellants respectfully request that the Appeal be reinstated, and that the time for the filing of the Initial Brief of the Respondents, be extended for Ninety (90) Days. The undersigned, as Counsel for the Appellants, and Counsel for the Respondents respectfully submit that, in all likelihood, the Case will be resolved by Settlement.

WHEREFORE, the Appellants, Ted Morris, Lorraine Morris, Coastal Timeshare Creations, LLC, d/b/a Coastal Visitors Center and Coastal Activities, Morr Marketing Enterprises, Inc., Tom Page, and Scott McCoy, do hereby respectfully request that this Honorable Court reinstate the Appeal with the understanding that, in the event that the Case is Settled, they will notify the Court accordingly, at which time the Case on Appeal may be Dismissed.


- SIGNATURE PAGE TO FOLLOW -

Respectfully submitted,

Ted Morris, Lorraine Morris, Coastal
Timeshare Creations, LLC, d/b/a, Coastal
Visitors Center and Coastal Activities, Morr
Marketing Enterprises, Inc., Tom Page and Scott
McCoy

APPELLANTS
BY COUNSEL

By:



John V. Esposito, J.D.
South Carolina Bar No. 1920
Esposito Law Offices
Post Office Drawer 5705
Hilton Head Island, SC 29938
843-785-6959
COUNSEL FOR THE APPELLANTS

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS
CARMEN T. MULLEN, JUDGE

RECEIVED

MAY 27 2014

SC Court of Appeals

CASE NO. 2010-CP-07-4328
APPELLATE CASE NO. 2013-000920

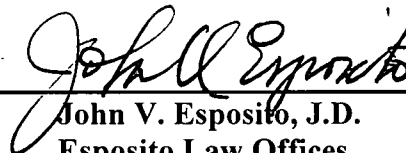
Coral Resorts, LLC and Coral Holdings, LLC,..... Respondents

vs.

Ted Morris, Lorraine Morris, Coastal Timeshare Creations, LLC d/b/a Coastal Visitors Center and Coastal Activities, Morr Marketing Enterprises, Inc., Tom Page and Scott McCoy,..... Appellants

CERTIFICATE OF SERVICE

I certify that I have served a copy of the Motion of the Appellants to Reinstate the Appeal, upon the Clerk of the South Carolina Court of Appeals, by depositing a copy of the Appellant's Motion, in the United States Priority Mail, postage prepaid, on May 22, 2014, and addressed to the Clerk of the South Carolina Court of Appeals, Ms. Jenny A. Kitchings, Post Office Box 11629, Columbia, SC 29211.



John V. Esposito, J.D.
Esposito Law Offices
Post Office Drawer 5705
Hilton Head Island, SC
843-785-6959

COUNSEL FOR THE APPELLANTS

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS
CARMEN T. MULLEN, JUDGE

RECEIVED

MAY 27 2014

SC Court of Appeals

CASE NO. 2010-CP-07-4328

APPELLATE CASE No. 2013-000920

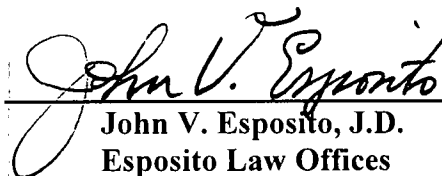
Coral Resorts, LLC and Coral Holdings, LLC,..... Respondents

vs.

Ted Morris, Lorraine Morris, Coastal Timeshare Creations, LLC d/b/a Coastal Visitors Center and Coastal Activities, Morr Marketing Enterprises, Inc., Tom Page and Scott McCoy,..... Appellants.

PROOF OF SERVICE

I certify that I have served a copy of the Motion of the Appellants to Reinstate the Appeal, upon the other Counsel for the Appellants, Ted Morris, Lorraine Morris, Coastal Timeshare Creations, LLC, d/b/a Coastal Visitors Center and Coastal Activities, Morr Marketing Enterprises, Inc., Tom Page and Scott McCoy, by depositing a copy of the Appellant's Motion, in the United States Mail, postage prepaid, on May 22, 2014, and addressed to their Attorney of Record, Joseph DuBois, Esq., c/o Naret & DuBois, Post Office Box 7228, Hilton Head Island, SC 29938.



John V. Esposito, J.D.
Esposito Law Offices
Post Office Drawer 5705
Hilton Head Island, SC
843-785-6959

COUNSEL FOR THE APPELLANTS

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS
CARMEN T. MULLEN, JUDGE

CASE NO. 2010-CP-07-4328
APPELLATE CASE NO. 2013-000920

RECEIVED
MAY 27 2014
SC Court of Appeals

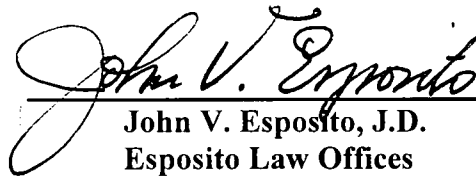
Coral Resorts, LLC and Coral Holdings, LLC,..... Respondents

vs.

Ted Morris, Lorraine Morris, Coastal Timeshare Creations, LLC d/b/a Coastal Visitors Center and Coastal Activities, Morr Marketing Enterprises, Inc., Tom Page and Scott McCoy,..... Appellants

PROOF OF SERVICE

I certify that I have served a copy of the Motion of the Appellants to Reinstate the Appeal, upon the Respondents, Coral Resorts, LLC and Coral holdings, LLC, by depositing a copy of the Appellant's Motion, in the United States Mail, postage prepaid, on May 22, 2014, and addressed to their Attorney of Record, Nekki Shutt, Esq., c/o Callison Tighe & Robinson, LLC, Post Office Box 1390, Columbia, SC 29202.



John V. Esposito, J.D.
Esposito Law Offices
Post Office Drawer 5705
Hilton Head Island, SC
843-785-6959

COUNSEL FOR THE APPELLANTS

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS
CARMEN T. MULLEN, JUDGE

CASE NO. 2010-CP-07-4328
APPELLATE CASE NO. 2013-000920

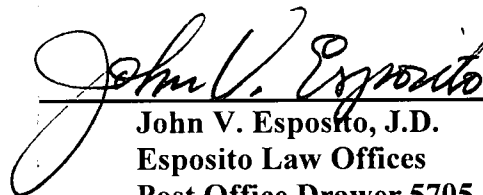
Coral Resorts, LLC and Coral Holdings, LLC,..... Respondents

vs.

Ted Morris, Lorraine Morris, Coastal Timeshare Creations, LLC d/b/a Coastal Visitors Center and Coastal Activities, Morr Marketing Enterprises, Inc., Tom Page and Scott McCoy,..... Appellants

PROOF OF SERVICE

I certify that I have served a copy of the Motion of the Appellants to Reinstate the Appeal; upon the Respondents, Coral Resorts, LLC and Coral holdings, LLC, by depositing a copy of the Appellant's Motion, in the United States Mail, postage prepaid, on May 22, 2014, and addressed to their Attorney of Record, Drew Laughlin, Esq., c/o Laughlin & Bowen, Post Office Drawer 21119, Hilton Head Island, SC 29925.



John V. Esposito, J.D.
Esposito Law Offices
Post Office Drawer 5705
Hilton Head Island, SC
843-785-6959

COUNSEL FOR THE APPELLANTS

LAW OFFICES
OF

John V. Esposito, J.D.

843-785-6959
Facsimile 843-785-8458

Office Address:

Suite 303 WatersEdge
At Shelter Cove Harbour
19 Shelter Cove Lane
Hilton Head Is., SC 29928

Mailing Address:

Post Office Drawer 5705
Hilton Head Is., SC 29938

May 22, 2014

VIA PRIORITY MAIL

Ms. Jenny A. Kitchings
Clerk of the South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RECEIVED

MAY 27 2014

SC Court of Appeals

In Re: Filing of Motion of Appellants
To Reinstate the Appeal in the Case of
Coral Resorts, LLC, et al. etc., Respondents
Versus
Ted Morris, et al, etc., Appellants
Civil Action Case No. 2010-CP-07-4328
Court of Common Pleas
Beaufort County, South Carolina
Appellate Case No. 2013-000920

Dear Ms. Kitchings,

Greetings!

Please find enclosed, with this correspondence, the Original, and six (6) copies of the Motion of the Appellants to Reinstate the Appeal. In addition, please find enclosed, with this correspondence, a Check, made payable to the Clerk of the South Carolina Court of Appeals, in the amount of Twenty Five (\$25.00) Dollars, which Check represents the Filing Fee for this Motion. Please note the Filing of this Motion accordingly.

In the event that you have any questions, or desire further clarification of the Motion, please advise. Once again, thank you for your cooperation. It is a pleasure to interact with your Office.

Sincerely,

John V. Esposito
John V. Esposito, J.D.

JVE/kmm
enclosure
c: Nekki Shutt, Esq. w/ enclosure
c: Drew Laughlin, Esq. w/ enclosure
c: Joseph DuBois, Esq. w/ enclosure



“... in the quest for justice ...”



UNITED STATES POSTAL SERVICE

Flat Rate Mailing Envelope

Visit us at usps.com

INTERNATIONAL RESTRICTIONS APPLY:

Customs forms are required. Consult the International Mail Manual (IMM) at pe.usps.com or ask a retail carrier.

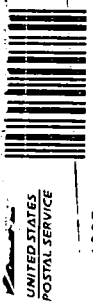


USPS TRACKING #



9114 9012 3080 1030 7044 87

Label 400 Jan 2013
7690-18-000-7948



MAY 22 '14

AMOUNT

\$0.00

00099911-05

1006

29211

RECEIVED

MAY 27 2014

SC Court of Appeals

TRY FLAT RATE
PRIORITY MAIL
• Built-in Tracking
• Postage rate locked
• No shipping label required
• Free Package Pickup
• usps.com/pe

John V. Esposito, J.D.

Esposito Law Offices

Post Office Drawer 5705

Hilton Head Island, SC 29938

From/

To/

Country

Ms. Jenny A. Kitchings
Clerk of the South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211