

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2005-CP-10-4101  
Appellate Case No.: 2012-212136

73770  
**RECEIVED**  
OCT 06 2014  
SC Court of Appeals

The Milton P. Demetre Family Limited Partnership.....Appellant,

v.

Harry Beckmann, III, Patricia P. Beckmann, Annie Ruth Hilton Crowley,  
Raymond Moody Crowley, Donald William Crowley, Harris L. Crowley, Jr.,  
and Annie Ruth Crowley Akinson.....Respondents.

**RESPONDENTS' MOTION FOR EXTENSION OF TIME**

Richard L. Whitt  
Jefferson D. Griffith, III  
Austin & Rogers, P.A.  
508 Hampton Street, Suite 300  
Columbia, South Carolina 29211  
*Attorneys for Respondents*

**OTHER COUNSEL OF RECORD:**

John Hughes Cooper, Esquire  
John Hughes Cooper, P.C.  
1476 Ben Sawyer Blvd., Suite 7  
Mt. Pleasant, South Carolina 29464  
*Attorney for Appellant*

Cain Denny, Esquire  
Cain Denny, P.A.  
Post Office Box 1205  
Charleston, South Carolina 29402  
*Attorney for Appellant*

**MOTION**

Respondents were ordered to file a Return in this matter on or before October 6, 2014, by an Order of this Court filed September 25, 2014.

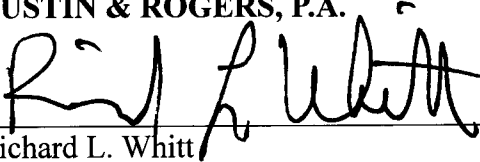
Respondents hereby respectfully request an extension of time to file their Return, until and including October 16, 2014.

The ground for Respondents' Motion, is that Respondents also have a filing due in this Court on Wednesday, October 8, 2014. Namely, Respondents' Initial Brief and Designation of Matter in Appellate Case No.: 2014-001588 are due this week. The press of both filings being due the same week requires us to ask for an extension of time to file our Return, as outlined hereinabove.

Respectfully Submitted,

**AUSTIN & ROGERS, P.A.**

By:



Richard L. Whitt

S.C. Bar No.: 62895

Jefferson D. Griffith, III

S.C. Bar No.: 2299

508 Hampton Street, Suite 300

P.O. Box 15907

Columbia, South Carolina 29211

Phone: (803) 256-4000

Fax: (803) 252-3679

*Attorneys for Respondents*

Columbia, South Carolina  
October 06, 2014

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2005-CP-10-4101  
Appellate Case No.: 2012-212136

**RECEIVED**  
OCT 06 2014  
**SC Court of Appeals**

The Milton P. Demetre Family Limited Partnership.....Appellant,

v.

Harry Beckmann, III, Patricia P. Beckmann, Annie Ruth Hilton Crowley,  
Raymond Moody Crowley, Donald William Crowley, Harris L. Crowley, Jr.,  
and Annie Ruth Crowley Akinson.....Respondents.

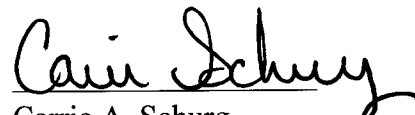
---

**PROOF OF SERVICE**

---

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have caused a copy of Respondents' Motion for an Extension of Time, correspondence to the Court and this Proof of Service, to be served via U.S. Mail on October 6, 2014, as addressed below.

Cain Denny, Esquire  
Cain Denny, P.A.  
Post Office Box 1205  
Charleston, South Carolina 29402

  
Carrie A. Schurg

October 6, 2014

ORIGINAL

# Austin & Rogers, P.A.

ATTORNEYS AND COUNSELORS AT LAW

C.C. HARNESS, III  
(1949-2010)

TIMOTHY F. ROGERS  
RAYMON E. LARK, JR.  
RICHARD L. WHITT  
EDWARD L. EUBANKS  
W. MICHAEL DUNCAN

**COLUMBIA OFFICE:**  
CONGAREE BUILDING  
508 HAMPTON STREET, SUITE 300  
POST OFFICE BOX 11716  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 256-4000  
FACSIMILE: (803) 252-3679  
WWW.AUSTINROGERSPA.COM

**OF COUNSEL:**  
WILLIAM FREDERICK AUSTIN  
JEFFERSON D. GRIFFITH, III\*

\* ALSO ADMITTED IN N.C.

October 6, 2014

**VIA, HAND-DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

**RECEIVED**  
OCT 06 2014  
**SC Court of Appeals**

- Re: ● The Milton P. Demetre Family Limited Partnership vs. Harry Beckmann, III, *et al.*  
● Appellate Case No.: 2012-212136  
● **Respondents' Motion for Extension of Time**

Dear Ms. Kitchings:

Enclosed for filing, please find the original and the required six copies of Respondents' Motion for Extension of Time and Proof of Service in the above-referenced matter. Also enclosed, please find a check in the amount of \$25.00, for the required filing fee.

Please accept these documents for filing and acknowledge receipt of the same by file-stamping the copies enclosed and returning them to me, via our courier.

Please don't hesitate to contact the undersigned if you have any questions or concerns.

With best regards, we are,

Respectfully Submitted,  
AUSTIN & ROGERS, P.A.



Richard L. Whitt  
Jefferson D. Griffith, III

RLW/cas  
Enclosures

cc: Cain Denny, Esquire