

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

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Appellate Case No.: 2014-002737

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**RECEIVED**

JAN 23 2015

S.C. Supreme Court

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 Atkinson.....Respondents.

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**MOTION  
FOR EXTENSION OF TIME  
TO FILE RETURN TO PETITION FOR A WRIT OF CERTIORARI**

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Jefferson D. Griffith, III  
S.C. Bar No.: 2299  
Richard L. Whitt  
S.C. Bar No.: 62895  
AUSTIN & ROGERS, P.A.  
508 Hampton Street, Suite 300  
Columbia, South Carolina 29211  
*Attorneys for Respondents*

**OTHER COUNSEL OF RECORD:**

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

**MOTION FOR EXTENSION OF TIME TO  
FILE RESPONDENTS' RETURN**

1. Respondents' Return to Appellant's Petition for a Writ of Certiorari is due to be filed with this Court on January 23, 2015.

2. The undersigned is lead counsel for Respondents, and I hereby motion this court for approval of an extension of time of twenty-one days, including Tuesday, February 17, 2015, to file Respondents' Return to Appellant's Petition for a Writ of Certiorari. Respondents have not previously sought an extension of time to make their filing.

3. The grounds for this Motion are that the undersigned needs additional time because of the press of other legal matters has hindered the ability of the undersigned to complete a Response to Appellant's Petition. Appellant's Petition is voluminous with five exceptions running nineteen typed pages and substantial time will be required to address the same. I am also a registered lobbyist before the S.C. General Assembly, which, along with the Martin Luther King Holiday, has limited my time to respond by the due date.

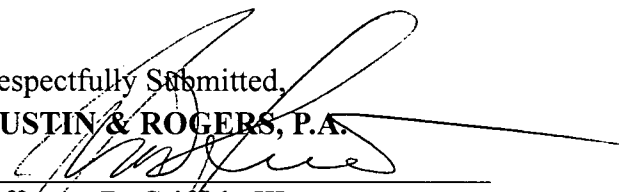
4. All counsel of record will be served with this Motion.

**CONCLUSION**

Based on the grounds set forth hereinabove, counsel respectfully motions this Court to grant Respondents' Motion for a twenty-one day extension of time, including Tuesday, February 17, 2015, to file their Return to Appellant's Petition for a Writ of Certiorari.

**[Signature Page Follows]**

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



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Jefferson D. Griffith, III,  
S.C. Bar No.: 2299  
Richard L. Whitt,  
S.C. Bar No.: 62895  
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January 22, 2015  
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Appellate Case No.: 2014-002737

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JAN 23 2015

S.C. Supreme Court

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

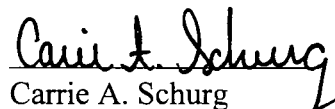
v.

Harry Beckmann, III, Patricia P. Beckmann, Annie Ruth Hilton Crowley,  
Raymond Moody Crowley, Donald William Crowley, Harris L. Crowley, Jr.,  
and Annie Ruth Crowley Atkinson.....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 Extension of Time to File Return to Petition for a Writ of Certiorari, correspondence to the Court and this Proof of Service, to be served via U.S. Mail on January 23, 2015, as addressed below.

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

  
Carrie A. Schurg

January 23, 2015  
Columbia, South Carolina

ORIGINAL

# Austin & Rogers, P.A.

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

\* ALSO ADMITTED IN N.C.

**RECEIVED**

JAN 23 2015

January 23, 2015

**S.C. Supreme Court**


**VIA, HAND-DELIVERY**

The Honorable Daniel E. Shearouse  
Clerk of Court  
South Carolina Supreme Court  
1231 Gervais Street  
Columbia, S.C. 29201

- Re: • The Milton P. Demetre Family Limited Partnership vs. Harry Beckmann, III, et al.  
• Appellate Case No.: 2014-002737  
• **Motion for Extension of Time to File Return to Petition for a Writ of Certiorari**

Dear Mr. Shearouse:

Enclosed, for filing in the above-referenced matter, please find the Respondents' Motion for Extension of Time to File Return to Petition for a Writ of Certiorari, the required six copies of the Motion and Certificate of Service. Also enclosed please find a check in the amount of \$25.00, which represents the appropriate filing fee. Please contact the undersigned should you need anything further.

Regards,  
AUSTIN & ROGERS, P.A.  
  
Carrie A. Schurg,  
Legal Assistant to Richard L. Whitt  
and Jefferson D. Griffith, III

/cas  
Enclosures

cc: Cain Denny, Esquire, via U.S. Mail



# The Supreme Court of South Carolina

Austin & Rogers, PA

01/23/2015

## RECEIPT #74835

**Case No:** 2014-002737  
**Case Short Title:** The Milton P. Demetre Family Ltd. Partnership v. Harry Beckmann, III  
**Event:** Motion - Extension of Time (1st)  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 1242  
**Check/Money Order Date:** 01/22/2015  
**Comments:**