

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No.: 2005-CP-10-4101

The Milton P. Demetre Family Limited PartnershipPetitioner

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 AtkinsonRespondents

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE REPLY

Petitioner respectfully moves for a fifteen (15) day extension of time to serve and file his Reply. Petitioner expects service of Respondents' Return by mail in the near future. Petitioner's Reply is currently due Monday February 23, 2015. Petitioner has not previously requested an extension regarding this Petition.

Petitioner's below-signed counsel has arranged to travel to Florida to attend his grandmother's funeral. To allow adequate time for Petitioner's counsel to consult with Petitioner and draft a meaningful Reply, Petitioner respectfully requests a fifteen (15) day extension of time until March 9, 2015 to serve and file his Return.

February 13, 2015

Cain Denny, P.A.

By: Cain Denny
Cain Denny, Esquire
S.C. Bar No. 13590
Post Office Box 1205
Charleston, S.C. 29402
(843) 478-0692
cain.denny@gmail.com
Attorney for Petitioner

RECEIVED

FEB 18 2015

S.C. SUPREME COURT

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PROOF OF SERVICE

I certify that I have served a copy of Petitioner’s Motion for an Extension of Time to Serve and File Reply on 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 by depositing a copy of it in the United States Mail, postage prepaid, on February 13, 2015, addressed to their attorneys of record, Jefferson D. Griffith, III, Esquire, and Richard L. Witt, Esquire, Austin & Rogers, P.A., Post Office Box 11716, Columbia, South Carolina 29211.

February 13, 2015

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Post Office Box 1205
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Attorney for Petitioner

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ATTORNEY AT LAW
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cain.denny@gmail.com

February 13, 2015

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
P.O. Box 11330
Columbia, SC 29211

Re: The Milton P. Demetre Family Limited Partnership vs.
Harry Beckmann, III, et al
Appellate Case No. 2012-212136
Charleston County Court of Common Pleas Case No. 2005-CP-10-4101

Dear Mr. Shearouse:

Enclosed please find:

- the original and seven (7) copies of Petitioner's Motion for an Extension of Time to Serve and File Reply;
- the original and one (1) copy of the Proof of Service; and
- a \$25 Motion Fee check.

Please return a stamped copies in the self-addressed envelope provided.

Best wishes.

Very truly yours,

Cain Denny

Cain Denny

c.c. Jefferson D. Griffith, III, Esquire
Richard L. Whitt, Esquire
Mr. Milton P. Demetre

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FEB 18 2015

S.C. SUPREME COURT



The Supreme Court of South Carolina

Cain Denny

02/18/2015

RECEIPT #75076

Case No: 2014-002737
Case Short Title: The Milton P. Demetre Family Ltd. Partnership v. Harry Beckmann, III
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 375427
Check/Money Order Date: 02/13/2015
Comments: