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IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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FEB 26 2015

**SC Court of Appeals**

APPEAL FROM THE COURT OF COMMON PLEAS  
COUNTY OF BEAUFORT  
FOURTEENTH JUDICIAL CIRCUIT

J. Ernest Kinard, Jr., Judge

Case No. 2012-CP-07-03209

The Callawassie Island Members Club, Inc.,

Respondent

v.

Michael J. Frey,

Appellant.

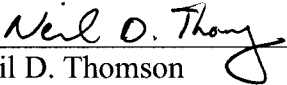
**MOTION TO EXTEND TIME FOR FILING  
INITIAL BRIEF OF APPELLANT**

Pursuant to Rule 240 of the South Carolina Rules of Appellate Procedure, Appellant hereby move the Court for a 27-day extension of time, to and including April 1, 2015, in which to file Appellant's initial brief. The grounds for this motion are that counsel for the Appellant needs additional time to compile the record and prepare the appeal materials, during which time counsel has extensive court appearances and an out-of-state trip scheduled. Counsel for Respondent has graciously consented to this request. The Notice of Appeal was filed on January 2, 2015, and Appellant has not previously requested any extensions of time in this action.

February 23<sup>rd</sup>, 2015

Respectfully submitted,

FORD WALLACE THOMSON LLC

  
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*Attorney for Appellant*

Other Counsel of Record:

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*Attorney for Respondent The Callawassie Island Members Club, Inc.*

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE COURT OF COMMON PLEAS  
COUNTY OF BEAUFORT  
FOURTEENTH JUDICIAL CIRCUIT

J. Ernest Kinard, Jr., Judge

Case No. 2012-CP-07-03209  
SC Court of Appeals No. 2015-000002

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**SC Court of Appeals**

The Callawassie Island Members Club, Inc.,

Respondent

v.

Michael J. Frey,

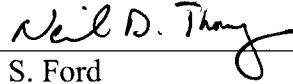
Appellant.

**PROOF OF SERVICE**

I certify that I have served the Motion to Extend Time for Filing Initial Brief of Appellant on The Callawassie Island Members Club, Inc., and all parties of record, by depositing a copy of it in the United States Mail, postage prepaid, on February 23, 2015, addressed to the attorneys of record, Ehrick K. Haight, Jr., Minor, Haight & Arundell, P.C., P. O. Drawer 6067, Hilton Head Island, SC 29938 and Stephen Hughes, Howell, Gibson and Hughes, P.O. Box 40, Beaufort, SC 29901.

February 23, 2015

Respectfully submitted,  
FORD WALLACE THOMSON LLC



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*Attorneys for Respondent, The Callawassie Island Members Club, Inc.*

# FORD WALLACE THOMSON LLC

ATTORNEYS AT LAW

February 23, 2015

Jenny Abbot Kitchings, Clerk  
SC Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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**SC Court of Appeals**

Re: *The Callawassie Island Members Club Inc. vs. Mary K. Quinn*  
Beaufort County Case No.: 2012-CP-07-03216  
SC Court of Appeals Case No.: 2015-000003

*The Callawassie Island Members Club Inc. vs. Michael J. Frey*  
Beaufort County Case No.: 2012-CP-07-03209  
SC Court of Appeals Case No.: 2015-000002

*The Callawassie Island Members Club Inc. vs. Gregory L. Martin*  
Beaufort County Case No.: 2012-CP-07-03218  
SC Court of Appeals Case No.: 2015-000001

Dear Jenny:

Enclosed for filing, please find the Motion to Extend Time for Filing Initial Brief of Appellant in each of the above referenced matters. If you would, please file and return the copy to us in the self-addressed stamped envelope provided for your convenience.

By copy of this letter, I am serving all counsel of record with the same.

Thank you in advance for your assistance with this matter. Should you have any questions or concerns, please do not hesitate to contact my office.

With kind regards, I am,

Very truly yours,



Ian S. Ford

ISF/smb

Enc. - as stated

Cc: Ehrick K. Haight, Jr., Esq.  
Stephen Hughes, Esq.