

THE STATE OF SOUTH CAROLINA  
South Carolina Court of Appeals

---

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

---

2012-CP-07-03209

---

The Callawassie Island Members Club, Inc.....Respondent,

vs.

Michael J. Frey and Grace I. Frey.....Defendants.

Of Whom Michael J. Frey is the Appellant.

---

CONSENT MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

---

Respondent The Callawassie Island Members Club, Inc. ("the Club") respectfully requests an extension of fifteen days to file Respondent's Initial Brief.

On March 31, 2015, Appellant served via U.S. Mail its Initial Brief. The brief was received by Counsel for the Club on April 7, 2015. Respondent moved for its time to respond to Appellant's Brief to be held in abeyance until such time as Appellant filed an amended brief to comply with the appellate citation rules. Respondent also moved for a thirty day extension after the formal filing of Appellant's Amended Initial Brief. Appellant filed a Consent Motion to Amend its Initial Brief, which was granted on May 14, 2015. Also, on May 14, 2015, the Court issued an order stating Respondent's Initial Brief was due June 1, 2015.

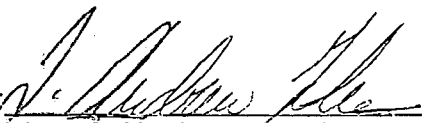
**RECEIVED**

MAY 28 2015

**SC Court of Appeals**

As Appellant's Amended Brief was not formally accepted by the Court until May 14, 2015 and due to the length of Appellant's brief and the amount of information contained therein, Respondent respectfully requests an extension of fifteen days with which to file its Initial Brief. Appellant has graciously consented to this motion.

HOWELL, GIBSON & HUGHES, P.A.

By:   
Stephen P. Hughes, Esq. #2805  
J. Andrew Yoho, Esq. #100803  
Howell, Gibson & Hughes, P.A.  
Post Office Box 40  
Beaufort, SC 29901  
(843) 522-2400

Ehrick K. Haight, Esq. #2446  
Stacey S. Collins, Esq. #73360  
Minor Haight & Arundell, P.C.  
P.O. Drawer 6067  
Hilton Head Island, South Carolina  
29938  
(843) 785- 8040

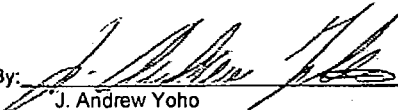
Attorneys for Respondent The  
Callawassie Island Members Club, Inc.

Beaufort, South Carolina

May 26, 2015

CERTIFICATE OF SERVICE

I certify that I served the foregoing Motion for Extension upon all counsel of record by affixing same with proper postage placing same with the United States Postal Service addressed to counsels' last known address on 26 day of May, 2015.

By:   
J. Andrew Yoho

2

**RECEIVED**  
MAY 28 2015  
**SC Court of Appeals**

HOWELL, GIBSON AND HUGHES, P.A.  
ATTORNEYS AT LAW

Post Office Box 40  
Beaufort, South Carolina 29901-0040  
www.hghpa.com

STEPHEN P. HUGHES  
PATRICK M. HIGGINS \*  
ROBERT W. ACHURCH III \*  
DAVID S. BLACK  
MARY BASS LOHR  
THOMAS A. BENDLE, JR.

25 RUE DU BOIS  
LADY'S ISLAND  
BEAUFORT, SOUTH CAROLINA 29907

J. ANDREW YOHO  
STEVEN A. JORDAN, JR.

TELEPHONE: 843 - 522-2400  
FAX NUMBER: 843 - 522-2429  
WRITER'S E-Mail: ayoho@hghpa.com  
WRITER'S DIRECT: 843 - 522-2408

JAMES S. GIBSON, JR. \*  
Of Counsel

\*Certified Mediator

May 26, 2015

Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

Re: The Callawassie Island Members Club, Inc. vs. Michael J.  
Frey and Grace I. Frey  
Appellate Case No. 2015-000002  
Civil Action No.: 2012-CP-07-03209  
Our File No: 10809 11 SPH

Dear Ms. Kitchings:

Please find enclosed herewith for filing, on behalf of The Callawassie Island Members Club, Inc., its Motion for Extension of Time to File Initial Brief with regard to the above referenced matter. Also enclosed please find our firm's check in the amount of \$25.00 in payment of the required motion fee. I would appreciate your filing the same and returning a filed clocked copy to me in the enclosed self-addressed, stamped envelope provided for your convenience.

By copy hereof to all counsel of record, I am providing them with a copy of the Motion as well.

Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.



J. Andrew Yoho

JAY/cab  
Enclosure

cc: Ehrick K. Haight, Jr., Esquire - via email only  
Stacey Collins, Esquire - via email only  
Ian S. Ford, Esquire - via email/US Mail  
Neil D. Thomson, Esquire - via email/US Mail

**RECEIVED**

MAY 28 2015

**SC Court of Appeals**