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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUN 22 2015

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

SC Court of Appeals

J. Ernest Kinard, Jr., Judge

Case No. 2012-CP-07-03209

The Callawassie Island Members Club, Inc.,

Respondent

v.

Michael J. Frey and Grace I. Frey,

Appellant.

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

Pursuant to Rule 240 of the South Carolina Rules of Appellate Procedure, Appellant hereby move the Court for a 15-day extension of time, to and including July 10, 2015, in which to file Appellant's initial reply brief. The grounds for this motion are the complexity of the issues presented in Respondent's initial brief, and an unusually busy period for Appellant's counsel. Counsel for Respondent has graciously consented to this request.

The Notice of Appeal was filed on January 2, 2015. The parties each have requested, and been granted, extensions on their initial briefs in this appeal.

June 19, 2015

Respectfully submitted,

FORD WALLACE THOMSON LLC



Ian S. Ford
Neil D. Thomson
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Charleston, SC 29403
843-277-2011
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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
BEAUFORT COUNTY
FOURTEENTH JUDICIAL CIRCUIT

J. Ernest Kinard, Jr., Judge

Appellate Case No. 2015-000002

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SO Court of Appeals

The Callawassie Island Members Club, Inc.,

Respondent,

v.

Michael J. Frey,

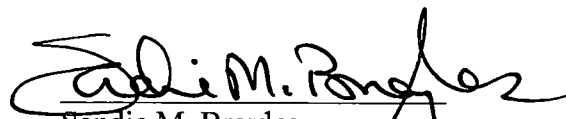
Appellant.

PROOF OF SERVICE

I certify that I have served the Motion To Extend Time For Filing Reply Brief Of Appellant, on all parties of record, by depositing a copy of it in the United States Mail, postage prepaid, on June 19, 2015, addressed to the attorney of record, Ehrick K. Haight, Jr., Esq., Minor, Haight & Arundell, P.C., P.O. Drawer 6067, Hilton Head, SC 29938 and Stephen Hughes, Esq. & Andrew Yoho, Esq., P.O. Box 40, Beaufort, SC 29901.

June 19, 2015

FORD WALLACE THOMSON LLC



Sandie M. Broyles
Paralegal to Ian S. Ford, Esq.
715 King St.
Charleston, SC 29403
T. 843.277.2011

FORD WALLACE THOMSON LLC

ATTORNEYS AT LAW

June 19, 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 Reply Brief of Appellant for each of the above-referenced matters.

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.

From: (843) 277-2011
Sandie Broyles
Ford Wallace Thomson LLC
715 King Street
Charleston, SC 29403

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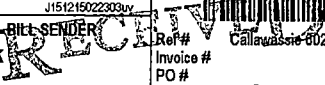
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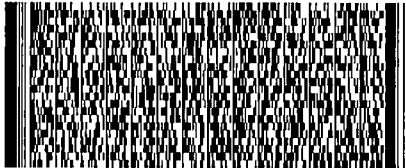
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JUN 22 2015

SC Court of Appeals

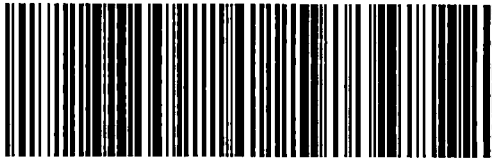
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