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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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JUN 29 2015

SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Appellate Case No. 2015-001146

Kiawah Resort Associates, L.P., a Delaware Limited Partnership, and
Kiawah Development Partners II, Inc.,

Appellant-Respondents,

vs.

Kiawah Island Community Association, Inc., a South Carolina Not-
for-Profit Corporation,

Respondent,

and

Kiawah Property Owners Group, Inc. and Inlet Cove Club Homeowners
Association, Inc.,

Respondent-Appellants.

**MOTION FOR EXTENSION OF TIME
FOR FILING INITIAL BRIEF AND DESIGNATION
OF RESPONDENT-APPELLANTS**

TO: ALL PARTIES AND THE COURT OF APPEALS:

PLEASE TAKE NOTICE that the Respondent-Appellants Kiawah Property Owners
Group, Inc. ("KPOG") and Inlet Cove Club Homeowners Association, Inc. ("Inlet Cove") hereby
move the Court of Appeals for an Order extending the time for filing their Initial Brief and
Designation of Matter. The Initial Brief and Designation are due on July 8, 2015, and

Respondent-Appellants KPOG and Inlet Cove seek an extension of approximately three (3) weeks, until July 31, 2015. The basis of this motion is as follows:

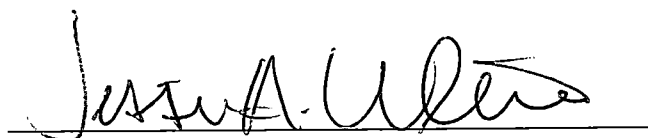
The briefing schedule in this matter was delayed and complicated by several factors. On May 22, 2015, counsel for the Appellant-Respondents Kiawah Resort Associates, L.P., ("KRA") and Kiawah Development Partners II, Inc., ("KDP II") filed its notice of appeal in this case and requested a hearing transcript. On June 8, 2015, counsel for KPOG and Inlet Cove filed its notice of appeal in this case and requested the matters be consolidated under the above-referenced case number. By letter dated June 16, 2015, counsel for KRA and KDP II notified the parties and this Court that it had received a copy of the hearing transcript on June 8, 2015.

On June 23, 2015, counsel for KPOG and Inlet Cove contacted the clerk's office to inquire about the status of the appeals as well as the preferred structure for filing briefs and was informed the appeal had in fact been consolidated under the above-referenced case number. Pursuant to this conversation, counsel for KPOG and Inlet Cove submitted an Amended Notice of Appeal dated June 23, 2015 reflecting its position as both appellant and respondent on matters to the appeal and confirmed that the deadline for submitting initial briefs was July 8, 2015. Upon information and belief, counsel for KRA and KDP II is requesting an extension of time, with the consent of the parties, for filing its initial brief and designation in the above-captioned matter. Therefore, counsel for KPOG and Inlet Cove respectfully requests an extension of time for filing its initial brief and designation in the above-captioned matter.

Counsel for Respondent-Appellants KPOG and Inlet Cove has consulted with counsel for the Appellant-Respondents KRA and KDP II and counsel for the Respondent Kiawah Island Community Association, Inc. ("KICA"), both of whom consent to this requested extension.

WHEREFORE, the Respondent-Appellants KPOG and Inlet Cove request that the Court of Appeals enter an order extending the time for filing their Initial Brief and Designation until July 31, 2015.

Respectfully submitted,



Amy E. Armstrong
Jessie A. White
SOUTH CAROLINA ENVIRONMENTAL LAW
PROJECT

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Counsel for Respondent-Appellants

Georgetown, South Carolina

June 24, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
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Respondent,

and

Kiawah Property Owners Group, Inc. and Inlet Cove Club Homeowners
Association, Inc.,

Respondent-Appellants.

CERTIFICATE OF SERVICE

I hereby certify that on this date I served copies of the Motion for Extension of Kiawah Property Owners Group and Inlet Cove Club Homeowners Association by placing copies of same in the U.S. mail addressed to:

Ellis R. Lesemann, Esq.
80 Alexander Street, 2nd Floor
Charleston, SC 29403

Allison C. Jett, Esq.
One Alliance Center, 4th Floor
3500 Lenox Road
Atlanta, GA 30326

Georgetown, South Carolina
June 24, 2015


Jessie A. White



The South Carolina Environmental Law Project
Lawyers for the Wild Side of South Carolina

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June 24, 2015 **RECEIVED**

JUN 29 2015

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Kiawah Resort Associates, L.P., et al. v. Kiawah Island
Community Association, Inc.
Appellate Case No. 2015-001146

Dear Ms. Kitchings:

Enclosed for filing please find the Motion for Extension of Time for filing the Initial Brief and Designation of Kiawah Property Owners Group and Inlet Cove Club Homeowners Association in the above-referenced matter, along with my certificate of service and filing fee.

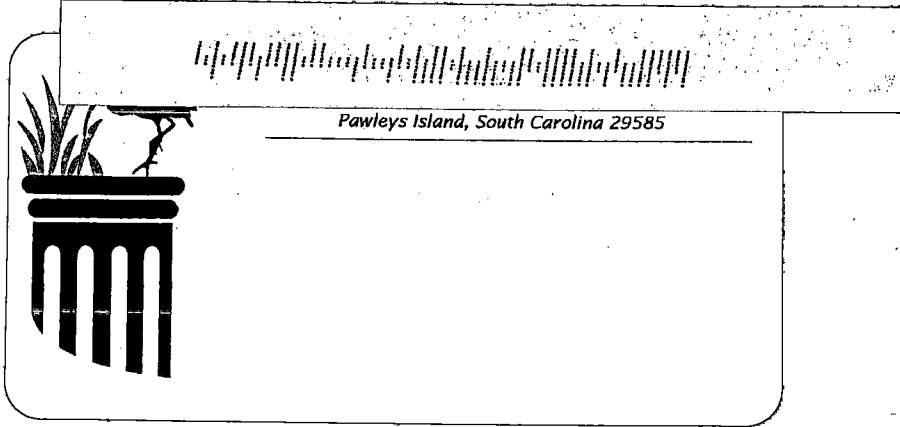
Please return a clocked-in copy in the self-addressed, postage marked envelope provided.

Thank you very much for your kind cooperation and assistance.

Yours very truly,

Jessie A. White

cc: Ellis Lesemann, Esq.
Allison C. Jett, Esq.



Pawleys Island, South Carolina 29585



The Honorable Jenny Abbott Kitchings
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