

**THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

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SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY

Court of Common Pleas

Marvin H. Dukes, III, Master-in Equity and Special Circuit Court Judge

**OPINION NUMBER 5309**

**HEARD NOVEMBER 4, 2014—FILED APRIL 1, 2015**

**WITHDRAWN, SUBSTITUTED, AND REFILED JUNE 3, 2015**

Bluffton Towne Center, LLC,

Respondent,

v.

Beth Ann Gilleland-Prince d/b/a  
The Law Office of Beth Ann Gilleland, LLC,

Petitioner.

**PETITIONER'S NOTICE OF MOTION AND MOTION FOR  
EXTENSION OF TIME TO FILE AND SERVE  
PETITION FOR WRIT OF CERTIORARI**

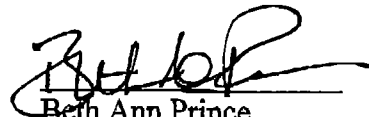
Petitioner, Beth Ann Gilleland-Prince d/b/a The Law Office of Beth Ann Gilleland, LLC, hereby respectfully requests this Honorable Court to grant the Petitioner's Motion for Extension of Time to File and Serve Petition for Writ of Certiorari. The grounds for this motion are as follows:

The Court of Appeals denied the Petitioner's Motion for Rehearing in the above-captioned matter on June 3, 2015. Filing and service of the Petition for Writ of Certiorari is due on today's date, July 6, 2015. Due to ongoing professional and personal

commitments, Petitioner respectfully requests an *additional five (5) days* to file and serve the Petitioner for Writ of Certiorari. Petitioner is familiar with this Court's Administrative Order dated July 16, 2014, wherein a party may be granted an extension for a maximum aggregate of twenty (20) days, absent showing extraordinary circumstances.

Therefore, based upon the foregoing, Petitioner respectfully requests an additional five (5) days from today's date, to file and serve the Petition for Writ of Certiorari, thereby extending the deadline to July 13, 2015.

July 6, 2015



Beth Ann Prince  
SC Bar # 68834  
Bauer & Metro, P.C.  
38A New Orleans Road  
Post Office Box 7965  
Hilton Head Island, SC 29938  
(843) 842-5297  
*Pro Se* Petitioner

*Other Counsel of Record:*  
Russell P. Patterson, Esquire  
P.O. Box 8047  
Hilton Head Island, SC 29938  
843-341-9300  
Attorney for Respondent

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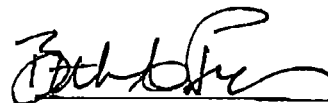
Beth Ann Gilleland-Prince d/b/a  
The Law Office of Beth Ann Gilleland, LLC,

Petitioner.

**PROOF OF SERVICE**

I certify that I have served the Petitioner's Notice of Motion and Motion for Extension of Time to File and Serve the Petition for Writ of Certiorari on the Respondent, Bluffton Towne Center, LLC, by depositing a copy of it in the U.S. Mail, postage prepaid, on July 6, 2015, addressed to its attorney of record, Russell P. Patterson, PO Box 8047, Hilton Head, SC 29938.

July 6, 2015



Beth Ann Prince  
SC Bar # 68834  
Bauer & Metro, P.C.  
38A New Orleans Road  
Post Office Box 7965  
Hilton Head Island, SC 29938  
(843) 842-5297  
*Pro Se* Petitioner



SAMUEL C. BAUER ROBERT S. METRO BETH ANN PRINCE

**BAUER & METRO** P.C.

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July 6, 2015  
VIA FACSIMILE (803) 734-1499  
AND U.S. FIRST CLASS MAIL

SC Court of Appeals

Honorable Daniel E. Shearouse  
Clerk of Court  
Supreme Court of South Carolina  
Post Office Box 11330  
Columbia, South Carolina 29211

**Re: Bluffton Towne Center, LLC v. Beth Ann Gilleland-Prince, et al.  
Opinion No. 5309 (S.C. Ct. App. Filed April 1, 2015, Withdrawn, Substituted  
and Refiled June 3, 2015)**

Dear Mr. Shearouse:

Enclosed please find the original and seven (7) copies of the Petitioner's Notice of Motion and Motion for Extension of Time to File and Serve Petition for Writ of Certiorari (in the amount of five (5) days), Proof of Service, and the appropriate filing fee. Please return the extra clocked copy in the envelope provided.

Thank you for your attention to his matter. If you should have any questions, please do not hesitate to contact me.

With kindest regards, I am

Yours very truly,

Beth Ann Prince

BAP/amg  
Encls.

cc: Russell Patterson, Esq. w/encls. (via U.S. Mail)  
Hon. Jenny Abbott Kitchings w/o encls. (via fax 803-734-1839 and U.S. Mail)