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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

RECEIVED

Appellate Case No. 2015-001146

AUG 25 2015

SC Court of Appeals

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.

**JOINT MOTION FOR EXTENSION OF TIME
FOR FILING RESPONSE BRIEFS OF RESPONDENT
AND 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") and
the Respondent Kiawah Island Community Association, Inc. ("KICA") hereby move the Court of
Appeals for an Order extending the time for filing their Response Briefs in the above-captioned

matter. The Response Briefs are due on August 31, 2015, and Respondent-Appellants KPOG and Inlet Cove and Respondent KICA seek an extension of thirty (30) days, until September 30, 2015. The basis of this motion is as follows:

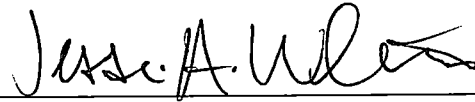
The Initial Brief of Appellant-Respondents Kiawah Resort Associates, L.P. ("KRA") and Kiawah Development Partners II, Inc. ("KDP II") is substantial consisting of fifty (50) pages and raising nine (9) separate issues on appeal, which requires significant time and resources in response. Counsel for Respondent-Appellants are a small office with only three attorneys and one support staff and are currently handling a full and active case load. Over the next several weeks counsel for Respondent-Appellants have numerous briefing deadlines and court filing requirements, including: four (4) filings in the Administrative Law Court for four (4) separate matters; two (2) filings in circuit court on unrelated matters; and three (3) filings, including the underlying, with this Court. Counsel for Respondent, who is the only South Carolina barred attorney in her firm, has been called for jury duty for the Superior Court in her resident area of DeKalb County, Georgia, which could affect her ability to commit the necessary time and resources to this matter. Additionally, the undersigned will be traveling out-of-state for a wedding from August 28th through August 30th.

Therefore, KPOG, Inlet Cove, and KICA respectfully move for an extension of time for the filing of their response briefs in the above-captioned matter.

Appellant-Respondents KRA and KDP II do not consent to this request.

WHEREFORE, the Respondent-Appellants KPOG and Inlet Cove and Respondent KICA request that the Court of Appeals enter an order extending the time for filing their Response Briefs until September 30, 2015.

Respectfully submitted,



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

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by Jessie White
with permission

Counsel for Respondent

Georgetown, South Carolina

August 21, 2015

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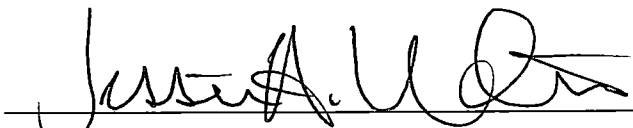
CERTIFICATE OF SERVICE

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

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Georgetown, South Carolina
August 21, 2015



Jessie A. White