

77188

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

SEP 09 2015

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

SC Court of Appeals

Marvin H. Dukes, III, Special Circuit Court Judge

Case No.: 2014-CP-07-829
Appellate Case No.: 2015-001523

Jerrold France

Appellant,

vs.

Club Development, Inc., John H. Barrett, individually, Barrett Investment Properties, LLC, Woodbury Properties, Inc., Taliaferro Corp., Taliaferro Corp. d/b/a Woodbury Properties, Harbour Homes, Coastal Foundation, Inc., and John Does 1-10, defendants,

Of which Club Development, Inc., John H. Barrett, individually, and Barrett Investment Properties, LLC are Respondents.

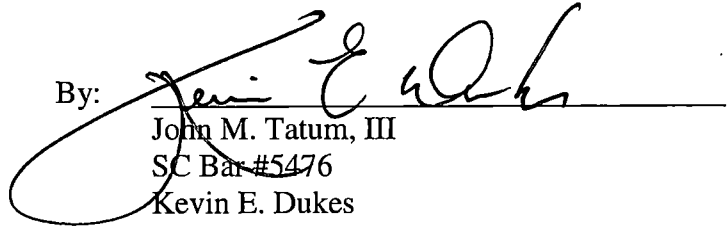
MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' INITIAL BRIEF

Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, Respondents Club Development, Inc., John H Barrett, and Barrett Investment Properties, LLC move this Court for an order granting an extension of thirty (30) days for Respondents to file and serve their initial brief in the above-captioned appeal. This request is being made due to counsel's present workload and other professional commitments. This is Respondents' first request for an extension of time.

Respondents' initial brief is currently due on Tuesday, September 8, 2015. If the motion is granted, Respondents' initial brief will be due on Thursday, October 8, 2015.

HARVEY & BATTEY, P.A.

By:



John M. Tatum, III

SC Bar #5476

Kevin E. Dukes

SC Bar # 100811

P.O. Box 1107

Beaufort, SC 29901

(p) (843) 524-3109

(f) (843) 524-6973

*Attorneys for Respondents,
Club Development, Inc., John H Barrett,
and Barrett Investment Properties, LLC*

Beaufort, South Carolina

September 3, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, III, Special Circuit Court Judge

Case No.: 2014-CP-07-829
Appellate Case No.: 2015-001523

Jerrold France

Appellant,

vs.

Club Development, Inc., John H. Barrett, individually, Barrett Investment Properties, LLC, Woodbury Properties, Inc., Taliaferro Corp., Taliaferro Corp. d/b/a Woodbury Properties, Harbour Homes, Coastal Foundation, Inc., and John Does 1-10, defendants,

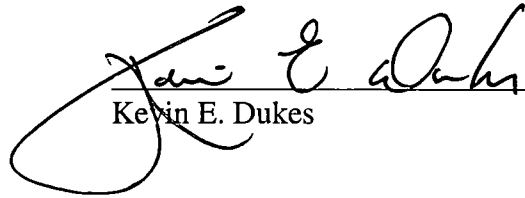
Of which Club Development, Inc., John H. Barrett, individually, and Barrett Investment Properties, LLC are Respondents.

PROOF OF SERVICE


PERSONALLY APPEARED BEFORE ME, the undersigned, who being duly sworn, states that he served Jerrold France with a copy of Respondents' Motion for Extension of Time to File Respondents' Initial Brief on September 3, 2015, by depositing a copy of the same in the United States Mail, with correct postage attached thereto, to the following counsel of record:

Andrew J. Toney, Esq.
Mullen Wylie, LLC
P.O. Box 5969
Hilton Head Island, SC 29938

RECEIVED
SEP 09 2015
SC Court of Appeals


Kevin E. Dukes

SWORN to before me this
3rd day of September, 2015


Notary Public for South Carolina
My commission expires: 11.4.15



HARVEY & BATTEY, PA
— ATTORNEYS AT LAW —
SINCE 1922

P.O. DRAWER 1107 • 1001 CRAVEN STREET • BEAUFORT, SC 29901-1107
(843) 524-3109 • (843) 524-6973 FAX • www.harveyandbattey.com

W. BRANTLEY HARVEY, SR.
(1893-1981)

W. BRANTLEY HARVEY, JR.
(Retired)

COLDEN R. BATTEY, JR.
(Of Counsel)

WILLIAM B. HARVEY, III
(SC Circuit Court Mediator)

JOHN M. TATUM, III
THOMAS C. DAVIS

THOMAS A. HOLLOWAY
(also admitted in PA and NJ)

EUGENE PARRS
(also admitted in NY, NC, FL and GA)

J. SAMUEL SCOVILLE
KEVIN E. DUKES

RECEIVED

SEP 09 2015

SC Court of Appeals

September 3, 2015

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

Re: Motion for Extension of Time to File Respondents' Initial Brief

Dear Ms. Kitchings:

Please find an original and a copy of the Respondents' Motion for Extension of Time to File Respondents' Initial Brief, along with the appropriate filing fee and Proof of Service. Please file the original and return a clocked copy in the self-address stamped envelope.

If you need anything additional from me, please do not hesitate to call me at (843) 524-3109. Thank you for your time and attention to this important matter.

Yours truly,

HARVEY & BATTEY

Kevin E. Dukes

cc: Andrew J. Toney, Esquire



HARVEY & BATTEY, PA
— ATTORNEYS AT LAW —
SINCE 1922



02 1P \$ 000.925
0000846962 SEP 03 2015
MAILED FROM ZIP CODE 29902

RECEIVED

SEP 09 2015

SC Court of Appeals

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

2921131629 5012

