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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
The Honorable Mikell R. Scarborough, Charleston County Master In Equity

RECEIVED  
OCT 02 2015  
SC Court of Appeals

Case No. 2011-CP-10-9513  
Appellate Case No. 2014-002742

Amh-Ashley Marina, LLC, and Amh Management, LLC.....Appellants,

v.

The Harborage at Ashley Marina Horizontal Property Regime,  
The Harborage at Ashley Marina Condominium Association,  
Eddy McCoy, Stuart Reeves, Brian Swan, Rich Cone, and Ed  
Miskotten, individually, are.....Respondents.

MOTION FOR LEAVE TO FILE OUTSIDE  
OF DEADLINE

Respondents, the Harborage at Ashley Marina Condominium Association, Inc.  
and the individual members of its Board of Directors, hereby request this Honorable  
Court for an Extension of Time to file Respondents' Final Brief outside of the deadline  
set forth in Rule 211, SCACR.

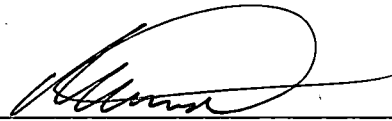
The Record on Appeal was filed on August 17, 2015, making the deadline to file  
Respondents' Final Brief, September 6, 2015. Due to a mistake in scheduling,  
Respondents incorrectly scheduled the deadline for September 16, 2015.

Prior to filing this Motion, counsel consulted with Appellants' attorney and no  
objection was made.

WHEREFORE, Respondents respectfully ask this Honorable Court for leave to submit their Final Brief outside of the deadline set forth in Rule 211, SCACR, and allow for an amended deadline of September 16, 2015.

Respectfully submitted,

THURMOND KIRCHNER TIMBES YELVERTON, P.A.

By: 

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*Attorneys for Respondents*

September 29, 2015  
Charleston, South Carolina

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Miskotten, individually, are.....Respondents.

AFFIDAVIT OF SERVICE

I, Moira W. Kerrigan, an employee of Thurmond Kirchner Timbes & Yelverton, P.A.,  
attorneys for the Respondents, do hereby certify that I have on this date served via U.S.  
Mail, a true and correct copy of the Respondents' Motion to File Out of Deadline to the  
following counsel of record:

**FOR THE APPELLANTS:**  
Edward K. Pritchard, III  
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By:   
Moira W. Kerrigan  
Paralegal to Michael A. Timbes

September 29, 2015  
Charleston, South Carolina

THURMOND KIRCHNER TIMBES & YELVERTON, P.A.  
ATTORNEYS & COUNSELORS AT LAW

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OCT 02 2015  
SC Court of Appeals

September 29, 2015

VIA FACSMILIE & U.S. MAIL

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211  
Fax to: 803-734-1839

Re: **Case Tracking No. 2014-002742**  
*AMI-Ashley Marina v. The Harborage at Ashley Marina*  
Case No. 2011-CP-10-9513


Dear Ms. Kitchings:

The firm represents the Respondents in connection with the above appeal. Please find enclosed and original and seven (7) copies of Respondents' Motion for Extension to File out of Deadline as well as this firm's check in the amount of \$25.00 in satisfaction of the filing fee. I would appreciate it very much if you would please file the original with the Court and return any extra file-stamped copies to me using the enclosed self-addressed, stamped envelope provided for your convenience. Should you have any questions or concerns, please do not hesitate to contact us. Your assistance with this matter is greatly appreciated.

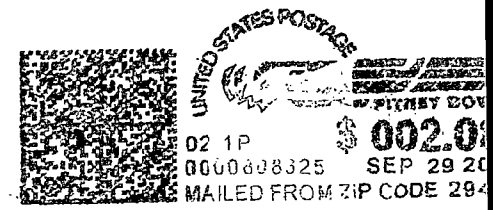
With kind regards, I remain

Very truly yours,

THURMOND KIRCHNER TIMBES & YELVERTON, P.A.

  
Moira Kerrigan  
Paralegal to Michael A. Timbes

cc: Edward K. Pritchard, Esquire



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