

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

**RECEIVED**

NOV 10 2015

Appeal from Dorchester County  
Court of Common Pleas

Diane Schafer Goodstein, Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2015-000599  
Circuit Court Case No. 2012-CP-18-2583

Live Oak Village Homeowners Association, Inc.;  
Jennifer McFarland; Carlton Holcombe and Ute Holcombe,

Plaintiffs,

Of whom Live Oak Village Homeowners Association, Inc.;  
Jennifer McFarland and Carlton Holcombe are

Appellants,

v.

Thomas Morris; David Hannemann; Sofia Mazell and  
Michael Mazell,

Respondents.

Sofia Mazell and Michael Mazell,

Third-Party Plaintiffs,

v.

William McFarland,

Third-Party Defendant.

**MOTION FOR SECOND EXTENSION OF TIME  
TO SERVE/FILE INITIAL REPLY BRIEF OF APPELLANTS**

*[counsel identified on following page]*

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Appellants*

*Additional Attorney for Appellants:*

SHELBOURNE LAW FIRM  
P. Brandt Shelbourne (SC Bar No. 15143)  
131 E. Richardson Avenue  
Summerville, South Carolina 29483  
(843) 871-2210

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA  
COURT OF APPEALS

COME NOW Appellants Live Oak Village Homeowners Association, Inc., Jennifer McFarland, and Carlton Holcombe, by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and move for a second extension of ten (10) days' time to serve/file their initial reply brief and corresponding designation of matter to be included in the record on appeal.

Respondents Thomas Morris and David Hannemann served their initial brief on October 19, 2015. Respondents Sofia and Michael Mazell served their initial brief the next day, October 20, 2015. Based on the earlier of the dates of service of the Respondents' initial briefs, on October 29, 2015, Appellants moved for a 10-day extension of the deadline for them to serve/file any initial reply brief and corresponding designation, i.e., an extension through today, November 9, 2015; this motion remains pending.

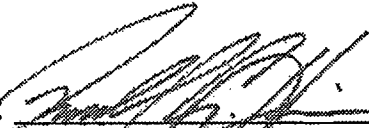
On account of other time commitments, both work-related and non-work-related, the undersigned counsel for Appellants respectfully requests that the deadline for any initial reply/designation by Appellants be extended through November 19, 2015, i.e., 10 days beyond the November 9<sup>th</sup> deadline previously requested. The undersigned submits that this relief is consistent with the interests of justice and will not work any undue prejudice upon

Respondents.

WHEREFORE, Appellants move this Honorable Court to grant them an extension of time to serve/file any initial reply brief and corresponding designation of matter to be included in the record on appeal through November 19, 2015. Further, Appellants request that the Court hold their present initial-reply-briefing/designation-of-matter deadline in abeyance until it acts on this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:   
Stephen L. Brown (S.C. Bar No. 66468)  
Russell G. Hines (S.C. Bar No. 72100)  
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P.O. Box 993 (29402)  
(843) 720-5488  
*Attorneys for Appellants*

Charleston, South Carolina

Dated: 11/9/15

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Jennifer McFarland; Carlton Holcombe and Ute Holcombe,

Plaintiffs,

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Sofia Mazell and Michael Mazell,

Third-Party Plaintiffs,

v.

William McFarland,

Third-Party Defendant.

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**PROOF OF SERVICE**

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*[counsel identified on following page]*

YOUNG CLEMENT RIVERS, LLP  
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*Attorneys for Appellants*

*Additional Attorney for Appellants:*

SHELBOURNE LAW FIRM  
P. Brandt Shelbourne (SC Bar No. 15143)  
131 E. Richardson Avenue  
Summerville, South Carolina 29483  
(843) 871-2210

I, Russell G. Hines, of Young Clement Rivers, LLP, attorneys for Appellants, do hereby certify that I have served the **MOTION FOR SECOND EXTENSION OF TIME TO SERVE/FILE INITIAL REPLY BRIEF OF APPELLANTS** on all Respondents by depositing a copy of the same into the United States Mail, with sufficient postage, on November 9, 2015, addressed as follows to their counsel of record:

Graham P. Powell, Esquire  
William W. Watkins, Jr., Esquire  
Katherine A. Stanton, Esquire  
Wall Templeton & Haldrup, P.A.  
P.O. Box 1200  
Charleston, SC 29402

*-and-*

Lydia P. Davidson, Esquire  
Krawcheck & Davidson, LLC  
9 State Street  
Charleston, SC 29401

*Attorneys for Thomas Morris and David Hannemann*

William B. Jung, Esquire  
William B. Jung, Esq., LLC  
1156 Bowman Road, Suite 200  
Mount Pleasant, SC 29464

*Attorney for Sofia Mazell and Michael Mazell*

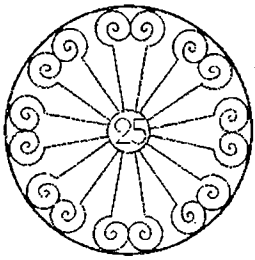
YOUNG CLEMENT RIVERS, LLP

By:   
Russell G. Hines

*Attorneys for Appellants*

Charleston, South Carolina

Dated: 11/9/15



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To: 18037341839  
From: kbarnes@ycrlaw.com  
Date: November 09, 12:09:25 PM EST  
Subj: Live Oak v. McFarland, et al; Case No.: 2015-000599  
Pages: 10

Dear Ms. Kitchings,

Attached please find correspondence in the above-referenced matter. The originals have been placed in the mail. Please let us know if you have any questions or concerns.

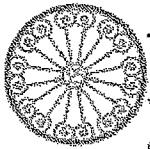
Thank you!

Katy B. Barnes  
Commercial Litigation Secretary  
Stephen L. Brown, Russell G. Hines & Joanna B. Stroud  
Young Clement Rivers, L.L.P.  
25 Calhoun Street, Suite 400  
Charleston, SC 29401  
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SC Court of Appeals



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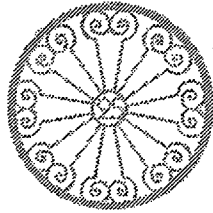
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**50 YEARS**

Kathleen B. Barnes  
Secretary

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1369  
E-mail: kbarnes@ycrlaw.com

November 9, 2015

**VIA US MAIL AND FACSIMILE**

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

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**SC Court of Appeals**

Re: Live Oak Village Homeowners Association, Inc., Jennifer McFarland and Campbell  
Holcombe v. Thomas Morris, David Hanneman, Sofia Mazell and Michael  
Mazell

Case No.: 2015-000599  
YCR File: 15508-20150492

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the Motion for Second Extension of Time to Serve/File Initial Reply Brief of Appellants, the original and one (1) copy of the Proof of Service and our firm's check in the amount of \$25.00.

Please file the originals and return court-stamped copies to me in the envelope provided.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes  
Secretary

/kbb

Enclosures

(all via US Mail and email)

Cc: Graham P. Powell, Esquire, Wall Templeton & Haldrup, P.A.  
William W. Watkins, Esquire, Wall Templeton & Haldrup, P.A.  
Katherine A. Stanton, Esquire, Wall Templeton & Haldrup, P.A.  
Lydia P. Davidson, Esquire, Krawcheck & Davidson, LLC  
William B. Jung, Esquire, William B. Jung, Esq., LLC