

**THE STATE OF SOUTH CAROLINA
In The Court of Appeals**

**APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas**

The Honorable Jenny Abbott Kitchings

Appellate Case No.: 2015-00-2187

RECEIVED

APR 28 2016

SC Court of Appeals

**Sea Island Food Group, LLC
d/b/a Squeeze,**

Appellant,

v.

**Yaschik Development
Company, Inc. d/b/a Yaschik
Enterprises, Hilton Smith,
East Bay Company, LTD.,
Thomas M. Ervin, and
Michael J. Quillen Family
Limited Partnership,**

**Defendants of whom
Hilton Smith and East
Bay Company, LTD
are Respondents,**

**Quillen Enterprises, LLC
d/b/a The Brick,**

Appellant,

v.

**Yaschik Development
Company, Inc. d/b/a Yaschik
Enterprises, Hilton Smith,
East Bay Company, LTD.,
Thomas M. Ervin, and
Michael J. Quillen Family
Limited Partnership,**

**Defendants of whom
Hilton Smith and East
Bay Company, LTD
are Respondents,**

**Michael J. Quillen Family
Limited Partnership,**

Third-Party Plaintiff,

v.

Top of the Bay, Inc., d/b/a
Club Light,

Third-Party
Defendant,

Top of the Bay, Inc., d/b/a
Club Light,

Fourth-Party Plaintiff,

v.

Yaschik Development
Company, Inc., d/b/a Yaschik
Enterprises,

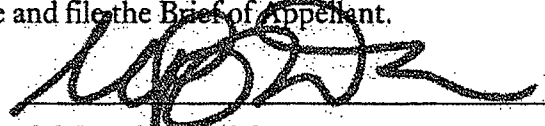
Fourth-Party
Defendant.

MOTION TO EXTEND TIME TO FILE BRIEF OF APPELLANT

Appellant Sea Island Food Group, LLC respectfully moves this Court for an Order extending the time to serve and file the Brief of Appellant, and in support of this motion, Appellant respectfully shows the following:

1. Appellant is seeking to hire an expert to provide co-counsel for the appeal.
2. Therefore, Appellant respectfully moves this Court for an Order extending the time to serve and file the Brief of Appellant.

April 27, 2016



M. Brooks Derrick
Law Office of M. Brooks Derrick
PO Box 967
224 NE Main Street
Simpsonville, SC 29681
(864) 881-2281

Attorney and Counselor for Appellant

Other Counsel of Record:

Charles Baker, III
Womble, Carlyle, Sandridge & Rice, LLP
5 Exchange Street
Charleston, SC 29401
Attorney for Respondents

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Limited Partnership,**

**Defendants of whom
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are Respondents,**

**Michael J. Quillen Family
Limited Partnership,**

Third-Party Plaintiff,

v.

PNC Bank, N.A. 040

4512

LAW OFFICES OF M. BROOKS DERRICK 12-15
224 NE MAIN STREET
SIMPSONVILLE, SC 29681
(864) 757-0757
OPERATING ACCOUNT

15-3/540
127
CHECK NUMBER
04/27/2016

PAY TO THE ORDER OF Clerk, South Carolina Court of Appeals

\$ **25.00

Twenty-five and 00/100 ***** DOLLARS

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



AUTHORIZED SIGNATURE

MEMO Filing Fee (Squeeze)

⑈004512⑈ ⑆054000030⑆ 5349173038⑈

THIS DOCUMENT MUST HAVE A COLORED BACKGROUND, ULTRAVIOLET FIBERS AND AN ARTIFICIAL WATERMARK ON THE BACK - VERIFY FOR AUTHENTICITY.

Law Offices Of M. Brooks Derrick

4512

04/27/2016 Clerk, South Carolina Court of Appeals

25.00

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25.00



Details on Back Security Features Included

Top of the Bay, Inc., d/b/a
Club Light,

Third-Party
Defendant,

Top of the Bay, Inc., d/b/a
Club Light,

Fourth-Party Plaintiff,

v.

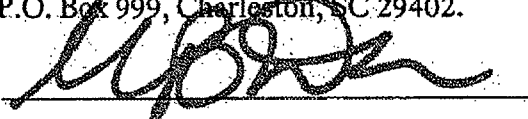
Yaschik Development
Company, Inc., d/b/a Yaschik
Enterprises,

Fourth-Party
Defendant.

PROOF OF SERVICE

I certify that I have served the Motion to Extend Time to File Brief of Appellant on Respondents by depositing a file, stamped copy in the United States Mail, postage prepaid, on April 27, 2016, addressed to the attorney of record Charles J. Baker, Womble Carlyle Sandridge & Rice, P.O. Box 999, Charleston, SC 29402.

April 27, 2016



M. Brooks Derrick
Law Office of M. Brooks Derrick
PO Box 967
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(864) 881-2281

Attorney and Counselor for Appellant



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ATTORNEYS & COUNSELORS AT LAW

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(864) 757-0757
(864) 729-3680 (FAX)

April 27, 2016

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SC Court of Appeals

Via Fax and U.S. Mail

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

Re: **Sea Island Food Group, LLC v. Yaschik Development Company**
Appellate Case No.: 2015-00-2187

Dear Ms. Kitchings:

I have enclosed the Motion to Extend Time to File Brief of Appellant in the above-referenced matter. I have also enclosed a Proof of Service on the Respondent, six copies of the Motion, and a check in the amount of \$25.00 to cover the cost of filing the Motion.

Should you have any questions or require any additional information, please do not hesitate to contact me at (864) 881-2281 or via email. (bderrick@derricklawoffice.com).

With kind regards,

Andrea Sansom
Legal Assistant to M. Brooks Derrick

Enclosure(s): as stated
cc: Charles J. Baker (via Email and U.S. Mail)