

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Master In Equity

Appellate Case No. 2016-001899  
Lower Court Case No. 2016-CP-07-1778

**RECEIVED**

OCT 28 2016

SC Court of Appeals

A & B Associates, L.P. ....Respondent,

v.

FCRE REL, LLC and Tidelands Realty, Inc. .... Defendants,

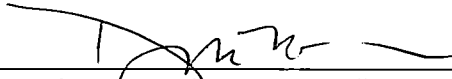
Of Whom FCRE REL, LLC is .....Appellant.

**APPELLANT'S MOTION FOR EXTENSION OF TIME**

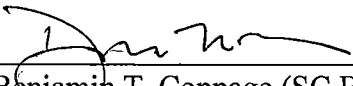
Pursuant to South Carolina Appellate Court Rule 263(b), Appellant FCRE REL, LLC moves for an extension of thirty (30) days from the existing deadline to file its Initial Brief in this matter. Appellant filed its Notice of Appeal on September 14, 2016. Appellant received the transcript on September 20, 2016 and Appellant's Initial Brief is now due on or before October 30, 2016. Appellant requests an extension of thirty (30) days to file the Initial Brief on the grounds Douglas M. Muller, Esquire, Robert E. Sumner, Esquire, and the law firm of Moore & Van Allen, PLLC, are joining Benjamin Terrell Coppage, Esquire and Coppage Law Firm, LLC as additional attorneys for Appellant.

Appellant's Initial Brief will be due on or before November 30, 2016 if the extension is granted. Appellant's counsel has conferred with counsel for Respondent regarding this motion, and they consent to the thirty (30) day extension.

For the reasons set forth herein, Appellant requests a thirty (30) day extension to serve and file its Initial Brief.

  
\_\_\_\_\_  
Douglas M. Muller (SC Bar #10277)  
Robert E. Sumner, IV (SC Bar #71728)  
Moore & Van Allen PLLC  
78 Wentworth Street (29401)  
P.O. Box 22828  
Charleston, SC 29413-2828  
(843) 579-7000 - telephone  
(843) 579-7099 - facsimile

and

  
\_\_\_\_\_  
Benjamin T. Coppage (SC Bar #100055) *for Benjamin T. Coppage*  
Post Office Box 2473 *w/ express*  
Beaufort, SC 29901 *permission*

Attorneys for Appellant FCRE REL, LLC

October 26, 2016

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Master In Equity

---

Appellate Case No. 2016-001899  
Lower Court Case No. 2016-CP-07-1778

---

**RECEIVED**  
OCT 28 2016  
SC Court of Appeals

A & B Associates, L.P. .... Respondent,

v.

FCRE REL, LLC and Tidelands Realty, Inc. .... Defendants,

Of Whom FCRE REL, LLC is ..... Appellant.

---

**PROOF OF SERVICE**

---

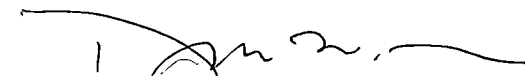
This is to certify that I have this day served counsel for the Defendants and Respondents in the foregoing matter with a copy of the foregoing *Appellant's Motion for Extension* by depositing same in the United States Mail with adequate postage affixed thereon to ensure delivery, addressed as follows:

Curtis L. Coltrane  
Coltrane & Wilkins, LLC  
Post Office Drawer 6808  
Hilton Head Island, SC 29938

Brian H. Mahany  
Timothy Granitz  
Mahany Law  
Post Office Box 511328  
Milwaukee WI 53203

Attorneys for Plaintiff/Respondent A & B ASSOCIATES, L.P.

October 26, 2016



Douglas M. Muller (SC Bar # 10277)

Robert E. Sumner, IV (SC Bar 71728)

Moore & Van Allen PLLC

78 Wentworth Street (29401)

P.O. Box 22828

Charleston, SC 29413-2828

(843) 579-7000 - telephone

(843) 579-7099 – facsimile

E-mail: dougmuller@mvalw.com

robertsumner@mvalaw.com

Attorneys for Appellant FCRE REL, LLC

**Moore&VanAllen**

October 26, 2016

**RECEIVED**

OCT 28 2016

**SC Court of Appeals**

Douglas M. Muller.  
Attorney at Law

T 843 579 7032  
F 843 579 8719  
dougsmuller@mvalaw.com

Moore & Van Allen PLLC

78 Wentworth St.  
Charleston, SC 29401-1428

Mailing Address:  
Post Office Box 22828  
Charleston, SC 29413-2828

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**Re: A & B Associates, L.P. v. FCRE REL, LLC; and TIDELAND REALTY, INC.**  
**Appellate Case No. 2016-001899**  
**Case No.: 2016-CP-07-1778**  
**Our File No.: 042814.000001**

Dear Ms. Kitchings:

Please find enclosed for filing an original and seven (7) copies of Appellant's Motion for Extension of Time and a Proof of Service in the above referenced case. I have also enclosed a check in the amount of \$25.00 for the requisite filing fee.

Please file the originals and return a date-stamped copy to me in the enclosed self-addressed stamped envelope provided.

By copy of this letter, I am serving all counsel of record with a copy of the same.

Thank you for your assistance in this matter.

Sincerely,

Moore & Van Allen PLLC

  
Douglas M. Muller

DMM/ws

Enclosures: as stated

cc: Curtis L. Coltrane, Esquire  
Brian H. Mahany, Esquire  
Timothy Granitz, Esquire  
Benjamin T. Coppage, Esquire  
Robert E. Sumner, IV, Esquire

Charlotte, NC  
Research Triangle Park, NC  
Charleston, SC

**RECEIVED**

OCT 28 2016

SC Court of Appeals

**Moore & Van Allen**

Moore & Van Allen PLLC

78 Wentworth Street  
Post Office Box 22828  
Charleston, SC 29413-2828

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

8669/42814.01