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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
The Honorable Marvin H. Dukes, III, Special Circuit Court Judge

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

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

v.

FCRE REL, LLC; and TIDELAND REALTY, INC..... Defendants,

Of whom FCRE REL, LLC is the.....Appellant.

MOTION FOR EXTENSION OF TIME TO FILE BRIEF OF APPELLANT

Pursuant to South Carolina Appellate Court Rule 263(b), Appellant FCRE REL, LLC moves for an extension of thirty days from the existing deadline to file its Initial Brief and Designation of Matter in the above referenced appeal. The Initial Brief of Appellant and Designation of Matter in the above appeal are due to be served and filed November 21, 2016. Due to my current heavy case load and upcoming deadlines, including a number of scheduled, out of town trips for mediation, depositions, and hearings, I am requesting a 30-day extension to file these documents. This is the second extension request in this case, and it is not intended for the purpose of delay.

By the undersigned's calculations, the extension, if granted, would extend the deadline for filing the Initial Brief and Designation of Matter to December 21, 2016. Appellant's counsel

has conferred with counsel for Respondent regarding this motion, and Respondent consents to the thirty (30) day extension for Appellant. The undersigned further requests that the time for filing be held in abeyance pending a ruling on this request.

November 7, 2016

By: 

Douglas M. Muller (SC Bar No. 10277)
Robert E. Sumner (SC Bar No. 71728)
MOORE & VAN ALLEN PLLC
78 Wentworth Street
P.O. Box 22828
Charleston, SC 29413-2828
Telephone: 843-579-7032
Facsimile: 843-579-8719
dougmuller@mvalaw.com
sumnerr@mvalaw.com

Attorneys for Appellant FCRE REL, LLC
and Defendant TIDELAND REALTY, INC.

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Of whom FCRE REL, LLC is the..... Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that on November 7, 2016, I served counsel of record in the foregoing matter with a copy of the Motion for Extension of Time to File Brief of Appellant by depositing same in the United States Mail with proper postage affixed, 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.

November 7, 2016

By: 

Douglas M. Muller (SC Bar No. 10277)

Robert E. Sumner (SC Bar No. 71728)

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Charleston, SC 29413-2828

Telephone: 843-579-7032

Facsimile: 843-579-8719

dougmuller@mvalaw.com

sumnerr@mvalaw.com

Attorneys for Appellant FCRE REL, LLC
and Defendant TIDELAND REALTY, INC.

Moore & Van Allen

November 7, 2016

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

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SC Court of Appeals

Robert E. Sumner, IV
Attorney at Law

T 843 579 7018
F 843 579 8743
robertsumner@mvalaw.com

Moore & Van Allen PLLC

78 Wentworth St.
Charleston, SC 29401-1428

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

**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

Robert E. Sumner, IV

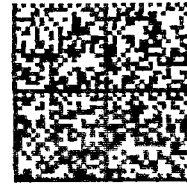
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Enclosures: as stated

cc: Curtis L. Coltrane, Esquire
Brian H. Mahany, Esquire
Timothy Granitz, Esquire
Benjamin T. Copping, Esquire
Douglas M. Muller, Esquire

Charlotte, NC
Research Triangle Park, NC
Charleston, SC

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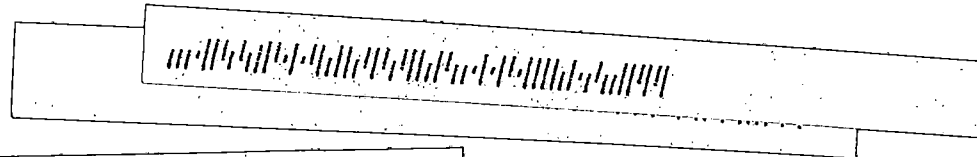
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