

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

JAN 11 2017

Kristi Lea Harrington, Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2015-000940

D.A. Morgan Price.....Respondent,

-v-

Todd Chas, Jacara Chas, Marsh Winds Owners Association, Inc. a/k/a Marsh Winds
Horizontal Property Regime, and the Marshland Communities, LLC, Defendants,

Of Whom Todd Chas and Jacara Chas are the Appellants.

APPELLANTS' REQUEST FOR ORAL ARGUMENT

On behalf of the Appellants, we respectfully request this Court of Appeals grant oral argument in this case as it involves a default judgment, which is an extraordinary remedy, and the Court would benefit from a full discussion of the record, authorities and the important issues at stake.

Respectfully Submitted,



Jeffrey S. Tibbals
Alexandra H. Austin
NEXSEN PRUET, LLC
205 King Street, Suite 400 (29401)
P.O. Box 486
Charleston, SC 29402
843.577.9440

January 9, 2017

Attorneys for Appellants

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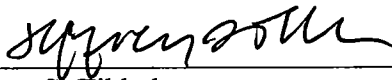
Todd Chas, Jacara Chas, Marsh Winds Owners Association, Inc. a/k/a Marsh Winds
Horizontal Property Regime, and the Marshland Communities, LLC, Defendants,

Of whom Todd Chas and Jacara Chas are the Appellants.

PROOF OF SERVICE

I, Jeffrey S. Tibbals, Esquire, hereby certify that on the 9th day of January, 2017, I
served a copy of APPELLANTS' REQUEST FOR ORAL ARGUMENT, submitted by
Appellants Todd Chas and Jacara Chas, upon counsel for Respondent via United States Mail,
postage prepaid, and addressed as follows:

Andrew S. Radeker
Harrison & Radeker, P.A.
P.O. Box 50143
Columbia, South Carolina 29250



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Jeffrey S. Tibbals
Member
Admitted in MD, VA, DC, SC

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SC Court of Appeals

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

Re: *D.A. Morgan Price v. Todd Chas, Jacara Chas, et al.*
Appellate Case No. 2015-000940

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Appellants' Request for Oral Argument in the above-referenced matter. Please file the original and return the file-stamped copy in the enclosed, postage-paid envelope.

By copy of this letter, I have served counsel for Respondent, as indicated in the Proof of Service.

Sincerely,



Jeffrey S. Tibbals

JST/ksh

Enclosures

cc: Andrew S. Radeker

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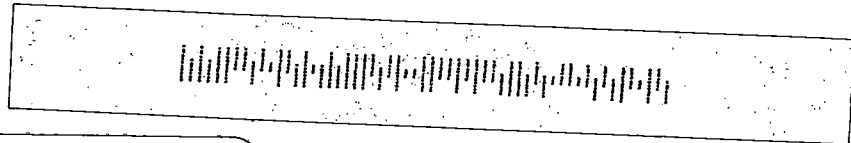


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