

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

Case No.: 2015-DR-17-2016

Dataw Island Owners Association, Inc, and Dataw Island Club, Inc.....Respondents

vs.

S.C. Asset Management, LLC.....Appellant

RECEIVED

AUG 25 2017

SC Court of Appeals

MOTION FOR EXTENSION OF TIME TO FILE

Appellant hereby moves the Court for a Thirty (30) day extension of time in which for Appellant to file his Initial Brief and the Designation of Matter to be Included in the Record on Appeal. This Motion is being made in good faith and for good cause as the issue that is central to this appeal is a question of first impression in the State of South Carolina in that it is a very unique fact pattern that involves a potentially mixed question of law and equity, raising additional issues concerning the proper standard of review as well. Accordingly, as Counsel has continued the research and drafting process the issues central to the proper presentation of this novel issue of law has further expanded the breadth of research essential and necessary to this



appeal. Moreover, Counsel for both parties have been in continuing discussions to potentially resolve this case without further intervention from the Court, and it is the belief of Counsel for Appellant that the requested extension may likely lead to such a negotiated disposition. This Motion is not interposed for purposes of delay, but is necessary for the appropriate development of the Appeal and potential resolution hereof without the use of additional resources of the parties or the judiciary. As indicated, Counsel for Appellant has spoken with Respondent's Counsel who has consented to this Motion for Extension of Time to File.

BRUMBACK & LANGLEY, LLC



Spencer D. Langley S.C. Bar No. 77687

Christopher T. Brumback S.C. Bar No. 75410

1 Augusta Street, Suite 301

Greenville, South Carolina 29601

(864) 414-9097

(866) 728-1205 (fax)

Attorney for Appellant

Other Counsel:

Carmen V. Ganjehsani
Richardson Plowden & Robinson, P.A.
1900 Barnwell Street
Columbia, SC 29201
Tel: 803.253.8692
Fax: 803.779.0016
Attorney Respondents

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.: 2017-000833

Dataw Island Owners Association, Inc, and Dataw Island Club, Inc.....Respondents

vs.

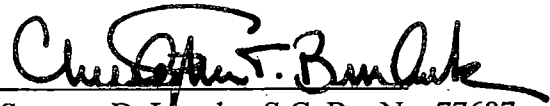
S.C. Asset Management, LLC.....Appellant

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time to File on Counsel for Respondents by first class U.S. mail on August 23, 2017, addressed to attorney of record, Carmen V. Ganjehsani, 1900 Barnwell Street, Columbia, South Carolina 29201.

August 23, 2017

BRUMBACK & LANGLEY, LLC



Spencer D. Langley S.C. Bar No. 77687
Christopher T. Brumback S.C. Bar No. 75410
1 Augusta Street, Suite 301
Greenville, South Carolina 29601
Attorney for Appellant

RECEIVED

AUG 25 2017

SC Court of Appeals

BRUMBACK & LANGLEY, LLC

ATTORNEYS & COUNSELORS AT LAW

CHRISTOPHER T. BRUMBACK, ESQ.

SPENCER D. LANGLEY, ESQ.

JOHN H. SCULLY, ESQ. (ASSOC.)

1 AUGUSTA STREET, SUITE 301D
GREENVILLE, SOUTH CAROLINA 29601
TELEPHONE (864) 414-9097
FACSIMILE (866) 728-1205

E-MAIL: chris@brumbacklangley.com

GENERAL & COMPLEX LITIGATION
BUSINESS & CORPORATE LAW
APPELLATE PRACTICE
CRIMINAL DEFENSE
REAL ESTATE

August 23, 2017

VIA FIRST CLASS MAIL

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

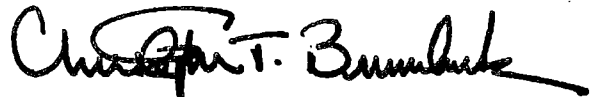
Re: *Dataw Island Owners Association, Inc. vs. S.C. Asset Management, LLC;*
Dataw Island Club, Inc.
Appellate Case No.: 2017-000833

Dear Ms. Kitchings:

Enclosed herewith, please find Appellant's Motion for Extension of Time to File and the check for the filing fee. If you have any questions or require anything else from my office, please do not hesitate to contact me at (864) 414-9097.

With kindest regards, I am

Truly yours,



Christopher T. Brumback, Esq.
Brumback & Langley, LLC

CC: Carmen V. Ganjehsani (via U.S. Mail)
Enclosures (2)

RECEIVED

AUG 25 2017

SC Court of Appeals



BRUMBACK
LANGLEY

Brumback & Langley, LLC
1 Augusta Street, Suite 301D
Greenville, South Carolina 29601



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

RECEIVED

AUG 25 2017

SC Court of Appeals

29211-162929

