

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM Horry COUNTY  
Court of Common Pleas

The Honorable Larry B. Hyman, Circuit Court Judge  
Fifteenth Judicial Circuit

Case No. 2015-CP-26-3173  
Appellate Case No. 2017-002642

**RECEIVED**  
FEB 06 2018  
SC Court of Appeals

Condo-World Development, LLC  
and Heron Point Golf Club Limited Partnership .....Respondent

vs.

Myrtle Beach Golf & Yacht Club Association, Inc. ....Appellant

AND

Myrtle Beach Golf & Yacht Club Association, Inc. ....Appellant

vs.

South State Bank .....Respondent

**RESPONDENTS CONDO-WORLD DEVELOPMENT, LLC AND  
HERON POINT GOLF CLUB LIMITED PARTNERSHIP'S  
MOTION FOR AN EXTENSION OF TIME**

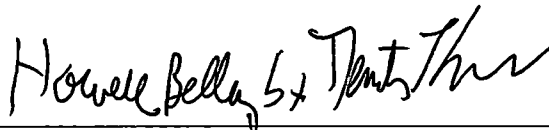
Pursuant to the South Carolina Appellate Court Rules, Respondents Condo-World Development, LLC and Heron Point Golf Club Limited Partnership ("Respondents"), by and through their undersigned counsel, hereby move for an order granting Respondents an extension of time, until February 20, 2018, in which to file and serve Respondents' Reply to Appellant's Response to Motion to Dismiss Appeal Dated December 19, 2017. Respondents' Reply is

currently due February 8, 2018. Respondents would submit this extension is necessary due to the following:

On February 1, 2018, Appellant served its Response to Motion to Dismiss Appeal Dated December 19, 2017.<sup>1</sup> Appellant's Response is 24 pages and the exhibits attached thereto contain over 500 pages. The five-day period in which to file and serve the Reply, as provided in Rule 240(f), SCACR, does not afford Respondents' counsel sufficient time in which to (a) review the arguments and exhibits contained in Appellant's Response; (b) draft and finalize the Reply; and (c) forward the completed Reply to the Respondents for review and approval prior to the current deadline of February 8, 2018.

Respondents' counsel further submits no prejudice will inure to Appellant by the granting of this Motion.

Respectfully submitted,

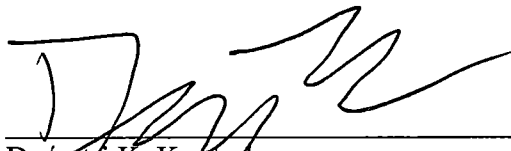


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Howell V. Bellamy, III  
Howell V. Bellamy, Jr.  
Bellamy, Rutenberg, Copeland, Epps, Gravely &  
Bowers, PA  
1000 – 29<sup>th</sup> Ave. N.  
Myrtle Beach, SC 29577  
Telephone: 843-448-2400  
Facsimile: 843-448-3022  
Email: [hbellamyiii@bellamylaw.com](mailto:hbellamyiii@bellamylaw.com)  
Email: [dnepe@bellamylaw.com](mailto:dnepe@bellamylaw.com)  
***Attorneys for Respondents Condo-World  
Development, LLC and Heron Point Golf  
Club Limited Partnership***

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<sup>1</sup> Appellant's Response was mistakenly submitted for filing under Appellate Case No. 2017-002196.



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Demetri K. Koutrakos  
Callison Tighe & Robinson, LLC  
1812 Lincoln Street, Suite #200  
P. O. Box 1390  
Columbia, SC 29202-1390  
Telephone: 803-404-6900  
Facsimile: 803-404-6902  
Email: [jimkoutrakos@callisontighe.com](mailto:jimkoutrakos@callisontighe.com)  
***Attorneys for Respondent Heron Point Golf  
Club Limited Partnership***

February 6, 2018

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM Horry COUNTY  
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**CERTIFICATE OF SERVICE**

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I, Kathleen S. Romero, an employee of Callison Tighe & Robinson, LLC, do hereby certify that, on this date, I served the foregoing **Condo-World Development, LLC and Heron Point Golf Club Limited Partnership's Motion for an Extension of Time** upon counsel of record, by depositing a copy of the same in the United States mail with proper first-class postage affixed thereon, addressed as follows:

Christopher H. Pearce, Esquire  
Kerry K. Jardine, Esquire  
Charles B. Jordan, Jr., Esquire  
The Pearce Law Group, PC  
1314 Professional Drive  
Myrtle Beach, SC 29577  
*(Attorneys for Appellant Myrtle Beach Golf & Yacht  
Club Association, Inc.)*

Audra M. Byrd, Esquire  
Turner Padgett Graham & Laney, PA  
2411 N. Oak Street  
P. O. Box 2116  
Myrtle Beach, SC 29578  
*(Attorneys for Respondent South State Bank)*

  
\_\_\_\_\_  
Kathleen S. Romero

February 6, 2018

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**Demetri "Jim" K. Koutrakos**

803.404.6900

JimKoutrakos@callisontighe.com

February 6, 2018

**RECEIVED**  
 FEB 06 2018  
 SC Court of Appeals

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
 Clerk of Court  
 SC Court of Appeals  
 1220 Senate Street  
 P. O. Box 11629  
 Columbia, SC 29211

RE: Condo-World Development, LLC and Heron Point Golf Club Limited Partnership vs. Myrtle Beach Golf & Yacht Club Association, Inc.  
 Case No. 2015-CP-26-3173  
Appellate Case No. 2017-002642

Dear Ms. Kitchings:

Enclosed herewith please find an original and seven (7) copies of Respondents Condo-World Development, LLC and Heron Point Golf Club Limited Partnership's Motion for an Extension of Time in the above-referenced matter. Kindly file the same and return a clocked-in copy to the courier. This firm's check in the amount of \$25 is enclosed in payment of the required filing fee.

The enclosed Motion seeks an extension of time in which to reply to Appellant's Response to Respondents' Motion to Dismiss Appeal Dated December 19, 2017, which was mistakenly submitted for filing by Appellant under Appellate Case No. 2017-002196.

By copy of this letter, the enclosed Motion is being served upon counsel of record.

With kind regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC



Demetri "Jim" K. Koutrakos

DKK:ksr

Enclosures

cc: Christopher H. Pearce, Esquire  
 Kerry K. Jardine, Esquire  
 Charles B. Jordan, Jr., Esquire  
 Audra M. Byrd, Esquire  
 Howell V. Bellamy, III, Esquire  
 Howell V. Bellamy, Jr., Esquire

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