

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Larry B. Hyman, Jr.  
Circuit Court Judge

**RECEIVED**  
MAR 30 2018  
SC Court of Appeals

Case No.: 2017-002196

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

v.

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

AND

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

v.

South State Bank. ....Respondent

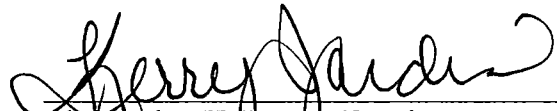
APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE RETURN TO  
RESPONDENT’S MOTION TO DETERMINE SCOPE OF CLAIMED STAY AND MOTION  
TO EXCEED PAGE LIMITS

Appellant Myrtle Beach Golf & Yacht Club Association, Inc., by and through its undersigned counsel hereby moves (i) for an extension of time to file its Return to Respondent’s Motion to Determine Scope of Claimed Stay and (ii) to exceed the page limits of the Return.

Appellant requests an extension of time because of (i) its current workload and (ii) the complex nature of this case and the issues involved in Respondent's motion, which Respondent has over-simplified. As a result of Respondent's oversimplification, Appellant's Return will exceed the page limit of Twenty-Five (25) pages in order to fully address the issues involved in Respondent's motion and which are necessary to a just adjudication of Respondent's motion. For the same reasons, Appellant is requesting an additional fifteen (15) days to file its Return to Motion. Appellant respectfully request that this Court grant its motion for an extension of time and to exceed page limits.

Respectfully submitted,

THE PEARCE LAW GROUP, P.C.



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*ATTORNEYS FOR APPELLANT,  
MYRTLE BEACH GOLF & YACHT CLUB  
ASSOCIATION, INC.*

Dated: March 29, 2018  
Myrtle Beach, South Carolina

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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PROOF OF SERVICE

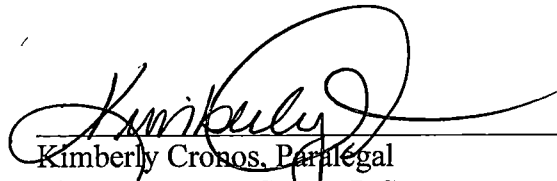
I certify that I have served the Motion for Extension of Time to Respond to Appeal via electronic mail communication and by depositing a copy of it in the United States mail, postage prepaid on March 29, 2018, addressed to the following attorneys of record:

Howell V. Bellamy, III, Esquire  
Howell V. Bellamy, Jr., Esquire  
The Bellamy Law Firm  
P.O. Box 357  
Myrtle Beach, SC 29578  
***Attorneys for Plaintiffs***

Audra M. Byrd, Esquire  
Turner Padgett Graham & Laney, PA  
P.O. Box 2116  
Myrtle Beach, SC 29578  
***Attorneys for South State Bank***

Demetri K. Koutrakos, Esquire  
Callison Tighe & Robinson, LLC  
P. O. Box 1390  
Columbia, SC 29202-1390  
***Attorney for Plaintiff Heron Point  
Golf Club Limited Partnership***

Dated: March 29, 2018

A handwritten signature in black ink, appearing to read "Kimberly Cronos", is written over a horizontal line.

Kimberly Cronos, Paralegal  
The Pearce Law Group, P.C.  
1314 Professional Drive  
Myrtle Beach, South Carolina 29577  
Telephone: (843) 839-3210  
Facsimile: (843) 839-3214

March 29, 2018

*Via UPS Overnight Mail*

**RECEIVED**  
MAR 30 2018  
SC Court of Appeals

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

Re: Condo-World Development, LLC v. Myrtle Beach Golf & Yacht Club Association, Inc.  
Appellate Court Case No.: 2017-002196  
PLG File No.: 12-0217

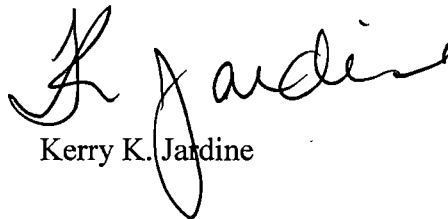
Dear Madam Kitchings:

Enclosed please find the original and six (6) copies of Appellant's Motion for Extension of Time to File Return to Respondent's Motion to Determine Scope of Claimed Stay and Motion to Exceed Page Limits. In addition, I have also enclosed our firm's check in the amount of \$25.00 as payment of the filing fee and the original and one (1) copy of a Proof of Service. Once the documents are filed, I would appreciate you returning filed copies to my attention.

Thank you for your assistance, and if you require anything further, please do not hesitate to contact our office.

Very truly yours,

THE PEARCE LAW GROUP, P.C.



Kerry K. Jardine

KKJ/kc  
Enclosures  
cc:

Howell V. Bellamy, II, Esq., with enclosures  
Howell V Bellamy, III, Esq., with enclosures  
Audra M. Byrd, Esq., with enclosures  
Demetri K. Koutrakos, Esq., with enclosures

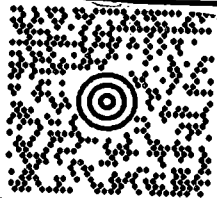
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1314 PROFESSIONAL DRIVE  
MYRTLE BEACH SC 29577

0.3 LBS LTR

1 OF 1

**SHIP TO:**

HONORABLE JENNY ABBOT KITCHINGS  
(803) 734-1890  
SOUTH CAROLINA COURT OF APPEALS  
1220 SENATE STREET  
**COLUMBIA SC 29201**



**SC 292 9-01**



**UPS 2ND DAY AIR A.M.**

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