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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

Case No.: 2017-002196

**RECEIVED**  
APR 11 2018  
SC Court of Appeals

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.

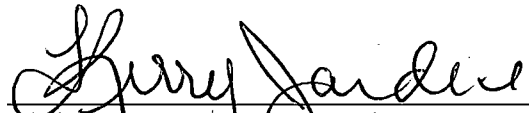
South State Bank.....Respondent

APPELLANT’S MOTION FOR LEAVE TO FILE REPLY  
BRIEF OUT OF TIME AND FOR AN EXTENSION OF TIME TO FILE REPLY BRIEF

Appellant Myrtle Beach Golf & Yacht Club Association, Inc., by and through its undersigned counsel hereby moves for leave to file Appellant’s Reply Brief out of time and for a ten (10) day extension to file Appellant’s Reply Brief. Appellant’s Reply Brief was to be served on April 9, 2018. Due to an inadvertent miscalculation of time, which included the allowance of one (1) extra day due to the observance of Good Friday, March 31, 2018, this motion is being

served on April 10, 2018. It was Appellant's counsel's intent to serve a Motion for Extension of Time to File Reply Brief; however, the date calculation error was discovered on April 10, 2018, which is why the motions are being filed concurrently.

This motion is filed, not for delay, but in the interests of justice, so that the Court may have all arguments of counsel. No prejudice will occur from allowing the filing of this Reply Brief out of time and granting Appellant an additional ten (10) day extension to file the Reply Brief. Respondent South State Bank's counsel, Audra M. Byrd, Esquire, has this same date consented to the extension of time requested herein. For these reasons, Appellant respectfully requests that the Court grant it leave to file its Reply Brief out of time and an extension of ten (10) days to file its Reply Brief.



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Kerry K. Jardine, Esquire  
1314 Professional Drive  
Myrtle Beach, South Carolina 29577  
Telephone: (843) 839-3210

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

Dated: April 10, 2018  
Myrtle Beach, South Carolina

IN THE STATE OF SOUTH CAROLINA

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PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Leave to File Reply Brief Out of Time and for an Extension of Time to File Reply Brief by depositing a copy of it in the United States mail, postage prepaid on April 10, 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

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***Attorneys for Plaintiffs***

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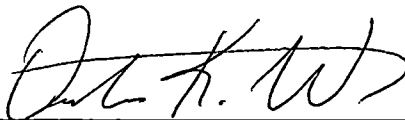
***Attorney for South State Bank***

Demetri K. Koutrakos, Esquire  
Callison Tighe & Robinson, LLC  
P. O. Box 1390  
Columbia, SC 29202-1390

jimkoutrakos@callisontighe.com

***Attorney for Plaintiff Heron Point  
Golf Club Limited Partnership***

Dated: April 10, 2018



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April 10, 2018

*Via UPS Overnight Mail*

**RECEIVED**  
APR 11 2018  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: Condo-World Development, LLC and Heron Point Golf Club Limited Partnership,  
Respondent v. Myrtle Beach Golf & Yacht Club Associations, Inc., Appellant  
and  
Myrtle Beach Golf & Yacht Club Association, Inc, Appellant. v. South State Bank,  
Respondent  
Appellate Court Case No.: 2017-02196  
PLG File No.: 2012-0217

Dear Madam Kitchings:

Enclosed please find for filing the original and one (1) copy each of Appellant's Motion for Leave to File Reply Brief Out of Time and for an Extension of Time to File Reply Brief, as well as the corresponding Proof of Service. Lastly, I have enclosed our firm's check in the amount of \$25.00 as payment of the filing fee.

Thank you for your assistance.

Very truly yours,

THE PEARCE LAW GROUP, P.C.



Kerry K. Jardine

KKJ/klc

Encls.

cc: Howell V Bellamy, Jr., Esq., via electronic and First Class U.S. Mail  
Howell V Bellamy, III, Esq., via electronic and First Class U.S. Mail  
Demetri K. Koutrakos, Esq., via electronic and First Class U.S. Mail  
Audra M. Byrd, Esq., via electronic and First Class U.S. Mail

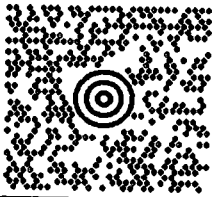
THE PEARCE LAW GROUP, P.C.  
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0.4 LBS LTR

1 OF 1

**SHIP TO:**

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



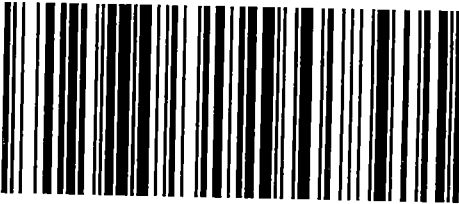
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SC Court of Appeals