

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Master-in-Equity

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Lower Court Case No. 2011-CP-07-2994  
Appellate Case No.: 2016-001789

**RECEIVED**  
APR 19 2018  
SC Court of Appeals

The Edgewater on Broad Creek  
Owners Association, Inc. .... Respondent,

v.

Ephesian Ventures, LLC ..... Appellant.

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**APPELLANT'S MOTION FOR AN EXTENSION OF TIME**

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Appellant Ephesian Ventures, LLC hereby respectfully requests this Honorable Court for an extension of thirty (30) days from the existing deadline to file its Initial Brief and Designation of Matter in the above captioned matter. The grounds for such request are that Attorney Michael Barfield's schedule for the last month has made it very difficult for him to be in the office to prepare Appellant's Brief and Designation of Matter, as he has either been in prescheduled mediations, arbitrations or depositions most days making it a challenge to allocate the time needed to prepare the brief.

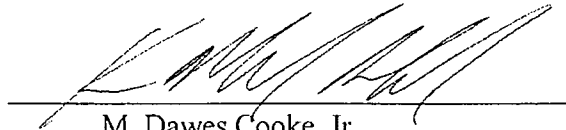
Appellant's Initial Brief and Designation of Matter is now due on or before April 23, 2018. If the extension is granted, Appellant's Initial Brief and Designation of Matter will be due on or before May 23, 2018. Appellant's counsel has conferred with counsel

for Respondent regarding this motion and counsel for Respondent consents to the thirty (30) day extension.

For the reasons set forth herein, Appellant requests a thirty (30) day extension to serve and file its Initial Brief and Designation of Matter.

BARNWELL WHALEY PATTERSON & HELMS, LLC

April 18, 2018



M. Dawes Cooke, Jr.  
S.C. State Bar No.: 1376  
K. Michael Barfield  
S.C. State Bar No.: 69400  
P.O. Drawer H  
Charleston, SC 29402  
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(843) 577-7700 FAX (843) 577-7708  
*Attorneys for Appellant*

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Ephesian Ventures, LLC .....Appellant.

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**PROOF OF SERVICE**

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I hereby certify that I have served the Motion for an Extension of Time on The Edgewater on Broad Creek Owners Association, Inc., by depositing a copy of it in the United States Mail, postage prepaid, on April 18, 2018 addressed to its attorneys of record Michael W. Mogil, 2 Corpus Christie Place, Ste. 303, Hilton Head Island, SC 29928, and Wm. Weston Jones Newton and F. Ward Borden, P.O. Box 1938, Bluffton, SC 29910.

BARNWELL WHALEY PATTERSON & HELMS, LLC



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Susan B. Hatch, Paralegal

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APR 19 2018  
**SC Court of Appeals**



K. Michael Barfield  
Mbarfield@barnwell-whaley.com

Reply to Charleston Office

April 18, 2018

Via Federal Express

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

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APR 19 2018  
**SC Court of Appeals**

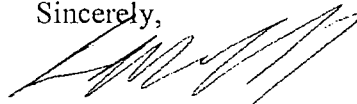
RE: *The Edgewater on Broad Creek Owners Association, Inc. v. Ephesian Ventures, LLC*  
Appellate Case No.: 2016-001789  
BWPH File No. 3017.196

Dear Ms. Kitchings:

Please find enclosed for filing an original plus six copies of Appellant's Motion for an Extension of Time in the above-referenced matter. Also enclosed is the Proof of Service of the Appellant's Motion for an Extension of Time on counsel for Respondent The Edgewater on Broad Creek Owners Association, Inc. and a check in the amount of \$25.00 for the filing fee. Please return a filed copy to me in the enclosed, self-addressed envelope.

By copy of this letter to all counsel of record, I am serving a copy of the Appellant's Motion for an Extension of Time upon them.

Sincerely,



K. Michael Barfield

Enclosures

c: Michael W. Mogil, Esq.  
Wm. Weston J. Newton, Esq.  
F. Ward Borden, Esq.

[www.barnwell-whaley.com](http://www.barnwell-whaley.com)

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288 Meeting Street, Suite 200, Charleston, SC 29401  
P 843.577.7700 F 843.577.7708

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1427 Military Cutoff Road, Suite 202, Wilmington, NC 28403  
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REPRESENTING CLIENTS IN ALL COURTS IN SOUTH CAROLINA AND NORTH CAROLINA AND IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

**Carter, Elizabeth A.**

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**From:** Kitchings, Jenny  
**Sent:** Thursday, April 19, 2018 8:18 AM  
**To:** Carter, Elizabeth A.  
**Subject:** FW: The Edgewater on Broad Creek Owners Association, Inc. v. Ephesian Ventures, LLC - Appellate Case No.: 2016-001789 - Motion for Ext.  
**Attachments:** LT Kitchings 04182018 enc Mtn for Ext of Time (00791636xA18B7).pdf; Appellant's Mtn for Ext of Time to file Initial Brief and Des of Matter 04182018 (00791637xA18B7).pdf

**Jenny Abbott Kitchings**  
*Clerk of Court*  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
Ph: (803) 734-1891

**RECEIVED**  
APR 19 2018  
SC Court of Appeals

**From:** Susan B. Hatch [mailto:shatch@barnwell-whaley.com]  
**Sent:** Wednesday, April 18, 2018 4:55 PM  
**To:** Kitchings, Jenny <jkitchings@sccourts.org>  
**Cc:** Michael Barfield <mbarfield@barnwell-whaley.com>; Janet Segell <jsegell@barnwell-whaley.com>; WNewton@jsplaw.net; bperkins@jsplaw.net; wborden@jsplaw.net; mmogil@mogillaw.com; Karen Jessee <kjessee@barnwell-whaley.com>  
**Subject:** The Edgewater on Broad Creek Owners Association, Inc. v. Ephesian Ventures, LLC - Appellate Case No.: 2016-001789 - Motion for Ext.

Attached is a cover letter and Appellant's Motion for an Extension of Time in connection with the above matter. I have federal expressed the original to you and have placed a copy in the mail to Respondent's counsel as well.

SUSAN B. HATCH  
PARALEGAL  
BARNWELL WHALEY PATTERSON & HELMS, LLC  
288 Meeting Street | Charleston SC 29401 | 843.577.7700 | 843.329.5316 (D)  
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