

86738

IN THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY

Court of Common Pleas

J. Ernest Kinard, Jr., Circuit Court Judge

Appellate Case No. 2015-000002

RECEIVED
MAY 16 2018
SC Court of Appeals

The Callawassie Island Members Club, Inc.,Respondent,

v.

Michael J. Frey and Grace I. FreyDefendants,

Of Whom Michael J. Frey is the Appellant.

**JOINT MOTION FOR EXTENSION
OF TIME TO FILE PETITIONS FOR REHEARING**

Pursuant to Rules 240 and 263(b) and of the South Carolina Appellate Court Rules, all parties to this appeal respectfully request an additional fifteen (15) days to file any Petitions for Rehearing, to June 1, 2018. The parties submit that there is good cause for this extension, as follows:

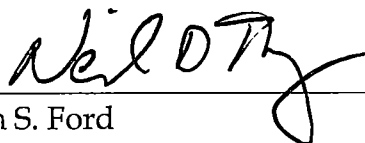
1. The Court filed its opinion in this case on May 2, 2018.

2. Simultaneous with its opinion in this action, the Court issued similar rulings in two other related actions: *The Callawassie Island Members Club, Inc. v. Gregory L. Martin and Rebecca L. Martin*, Appellate Case No. 2015-000001; and *The Callawassie Island Members Club, Inc. v. Mark K. Quinn and Sherry B. Quinn*, Appellate Case No. 2015-000003.
3. Pursuant to S.C.A.C.R., Rule 221(a), the parties must file any Petitions for Rehearing within fifteen days after the filing of the Court's opinion, *i.e.*, on or before May 17, 2018.
4. All parties request an additional fifteen days, to June 1, 2018, to file any Petitions for Rehearing.
5. The reasons for the request are (a) the complexity of issues and law in the Court's opinions, some of which favor and disfavor the various parties, (b) the length of the record on appeal which needs to be reviewed, and (c) that all parties are attempting to coordinate responses in the three related cases involving Callawassie.

Therefore, the parties respectfully ask this Court to permit all parties until June 1, 2018, to file any Petitions for Rehearing.

(signatures on following page)

Respectfully submitted,



Ian S. Ford

Bar no. 12463

Neil D. Thomson

Bar no. 71209

FORD WALLACE THOMSON LLC

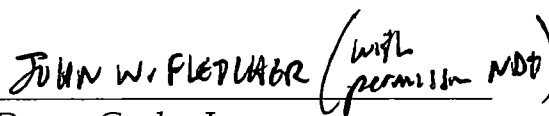
715 King Street

Charleston, South Carolina 29403

843-277-2011

Attorneys for Appellant

And



M. Dawes Cooke, Jr.

John W. Fletcher

Barnwell Whaley Patterson & Helms,

LLC

P.O. Drawer H

(288 Meeting Street, Suite 200)

Charleston, SC 29402

843-577-7700

Attorneys for Respondent

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE COURT OF COMMON PLEAS
BEAUFORT COUNTY
FOURTEENTH JUDICIAL CIRCUIT

J. Ernest Kinard, Jr., Judge

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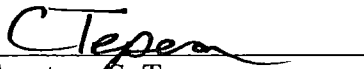
Defendants,

PROOF OF SERVICE

I certify that I have served the Joint Motion for Extension of Time to File Petitions for Rehearing, on all parties of record, by depositing a copy of it in the United States Mail, postage prepaid, on May 15, 2018, addressed to the attorney of record, M. Dawes Cooke, Jr. and John W. Fletcher, Barnwell Whaley Patterson & Helms, LLC, P.O. Drawer H, Charleston, SC 29402.

May 15, 2018

FORD WALLACE THOMSON LLC


Courtney S. Tepera
Paralegal to Ian S. Ford, Esquire
715 King St.
Charleston, SC 29403
T. 843.277.2011

FORD WALLACE THOMSON LLC

ATTORNEYS AT LAW

May 15, 2018

VIA FEDERAL EXPRESS; OVERNIGHT DELIVERY

Jenny Abbot Kitchings, Clerk
SC Court of Appeals
Attention: Elizabeth
P.O. Box 11629
Columbia, SC 29211

Re: *The Callawassie Island Members Club Inc. vs. Gregory L. Martin*
Beaufort County Case No.: 2012-CP-07-03218
SC Court of Appeals Case No.: 2015-000001

The Callawassie Island Members Club Inc. vs. Michael J. Frey
Beaufort County Case No.: 2012-CP-07-03209
SC Court of Appeals Case No.: 2015-000002

The Callawassie Island Members Club Inc. vs. Mark K. Quinn
Beaufort County Case No.: 2012-CP-07-03216
SC Court of Appeals Case No.: 2015-000003

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Dear Elizabeth:

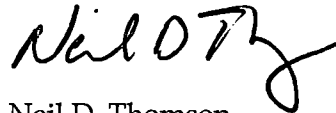
Enclosed for filing please find the original and six copies of the Joint Motion for Extension of Time to File Petitions for Rehearing along with a Proof of Service in each of the above-referenced matters.

I would appreciate your filing the same and returning a filed copy to me with the enclosed postage pre-paid Federal Express label provided for your convenience.

Thank you in advance for your assistance with this matter. Should you have any questions or concerns, please do not hesitate to contact my office.

With kind regards, I am,

Very truly yours,



Neil D. Thomson
Ian S. Ford

NDT/cst
Enc. - as stated

FORD WALLACE THOMSON LLC

ATTORNEYS AT LAW

cc: M. Dawes Cooke, Jr.
John W. Fletcher

ORIGIN ID:RBWA (843) 277-2011
SANDIE BROYLES
FORD WALLACE THOMSON LLC
715 KING STREET

SHIP DATE: 15MAY18
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CAD: 104624353/NET3980

CHARLESTON, SC 29403
UNITED STATES US

BILL SENDER

TO **JENNY ABBOTT KITCHINGS, CLERK**
SC COURT OF APPEALS
1015 SUMTER STREET
SUITE 100
COLUMBIA SC 29201

552.02.0782.BDCA5

(803) 734-1890

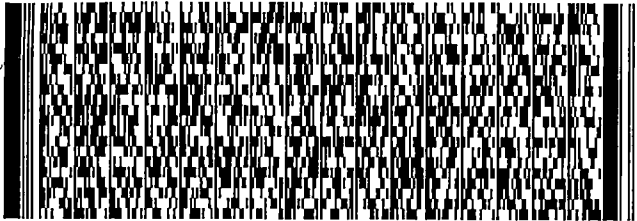
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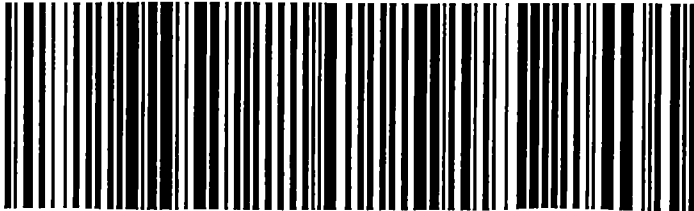
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PRIORITY OVERNIGHT

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MAY 16 2018

SC Court of Appeals

5/15/2018