

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

APPEAL FROM CHARLESTON COUNTY  
COURT OF COMMON PLEAS

JUL 12 2018

The Hon. J.C. Nicholson, Jr., Circuit Court Judge SC Court of Appeals

CASE NO. 2016-000474

C. GORDON LOVINGOOD, JR., C3 INVESTMENTS, INC., and PPC12, LLC

Appellants,

v.

VICTOR APAT, ANTHONY MCALLISTER, J. ERIC WADE d/b/a CT TOURING,  
and PEARL CO. SC, LLC, Defendants, of whom,

ANTHONY MCALLISTER; J. ERIC WADE d/b/a CT TOURING;  
and PEARL CO. SC, LLC are

Respondents.

CONSENT MOTION FOR EXTENSION OF TIME

David B. Marvel  
P.O. Box 22734  
Charleston, South Carolina 29413  
Ph. (843) 853-4877  
Fax (843) 380-3025  
Email: dave@marvel.lawyer


COME NOW APPELLANTS, C. Gordon Lovingood, Jr., C3 Investments, Inc. and PPC12, LLC, through undersigned counsel, and who hereby move this Honorable Court, pursuant to Rule 263(b), SCACR, for an Extension of Time to file a Petition for Rehearing.

Rule 221, SCACR requires Respondents' Petition for Rehearing to be received by the Court of Appeals on or before July 12, 2017. Respondents request an extension of eighteen days, which would allow the Petition for Rehearing to be filed on or before Monday, July 30, 2018. Respondents counsel Brandon has affirmatively stated his consent to this extension.

Undersigned counsel was out of the office for much of June, 2018, after having shoulder surgery. Further, Appellant Lovingood, who is also the principal of Appellant C3 Investments, Inc. is out of the country and the undersigned has not yet had the opportunity to fully discuss the status of the case with his client, such that no actual decision has been made regarding the filing of a Petition for Rehearing. Appellants submit this constitutes good cause for the requested extension.

Accordingly., Appellants respectfully request that this Honorable Court grant such extension to allow Respondents' Petition for Rehearing to be submitted on or before July 30, 2018.

RESPECTFULLY SUBMITTED:



David B. Marvel

P.O. Box 22734

Charleston, South Carolina 29413

Ph. (843) 853-4877

Fax (843) 380-3025

Email: [dave@marvel.lawyer](mailto:dave@marvel.lawyer)

ATTORNEY FOR THE RESPONDENTS

Charleston, South Carolina  
July 12, 2018

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Appellants,

v.

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and PEARL CO. SC, LLC, Defendants, of whom,

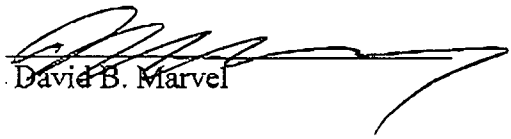
ANTHONY MCALLISTER; J. ERIC WADE d/b/a CT TOURING;  
and PEARL CO. SC, LLC are

Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 12<sup>th</sup> day of July, 2018, I served respondents' counsel with Appellant's Consent Motion for Extension of Time for filing a Petition for Rehearing by mailing a copy to their counsel, Trudy H. Robertson and Brandon Gaskins, by U.S. Mail, postage prepaid, at the following address:

Moore Van Allen  
78 Wentworth Street  
Charleston, South Carolina 29401

  
David B. Marvel

MARVEL ET AL LLC  
P.O. BOX 22734  
CHARLESTON, SC 29413-2734  
(843) 853-4877

Bank of America  
ACH R/T 053904483

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67-448/539 SC  
1708

07/12/2018

PAY: SC Court of Appeals

\*\*25.00

Twenty-five and 00/100

DATE

AMOUNT

TO THE  
ORDER  
OF

SC Court of Appeals  
1220 Senate St.  
Columbia, SC 29201

16-474



AUTHORIZED SIGNATURE

MARVEL ET AL LLC

07/12/2018

SC Court of Appeals

3144

filing Fee motion for extension Petition for Rehearing

25.00

Business Advantage Chk (4771)

16-474

25.00

MARVEL ET AL LLC

07/12/2018

SC Court of Appeals

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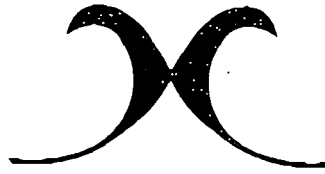
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16-474

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# DAVID B. MARVEL

Attorney at Law - Proctor in Admiralty  
Certified Civil and Federal Court Mediator  
Admitted to Practice in South Carolina and Georgia

[www.marvel.lawyer](http://www.marvel.lawyer)

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JUL 12 2018

SC Court of Appeals

July 12, 2018

Via Facsimile to (803) 734-1839 and U.S. Mail

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, South Carolina 29211

Re: C. Gordon Lovingood, Jr. v. Victor Apat  
Case No. 2016-000474

Dear Ms. Kitchings,

I hope this letter finds you well. I have attached a Consent Motion for an Extension of Time, requesting an extension to file Appellants' Petition for Rehearing. I understand that the Court will accept filing of this Motion by fax, and I greatly appreciate your consideration in that regard. I have also included a copy of my check for the filing, which is being transmitted by mail with the original.

Please file these documents in your usual prompt and efficient manner. If you have any questions, comments, or concerns, please do not hesitate to contact me at any time.

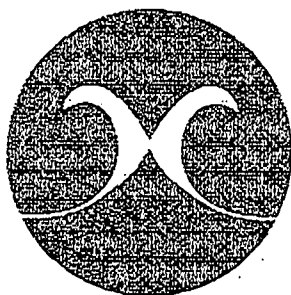
With best regards, I remain

Sincerely,

  
David B. Marvel

Enclosures

cc: Brandon Gaskins, Attorney for the Respondents



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JUL 12 2018

SC Court of Appeals

**FAX COVER SHEET**

TO: Jenny Abbot Kitchings  
Clerk of Court

FAX: 803 734 1839

FROM: David B. Marvel  
(fax # - 843-380-3025)

RE: Lovingood v. Apat  
Case No. 2016-000474

6 Pages Including Cover

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