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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS

Marvin H. Dukes, III, Master in Equity

Appellate Case No. 2016-001769

RECEIVED
AUG 16 2018
SC Court of Appeals

The Edgewater on Broad Creek Owners Association, Inc.,
and the Council of Co-owners of the Edgewater on
Broad Creek Horizontal Property Regime Phase I, . . . Plaintiffs,

Of which The Edgewater on Broad Creek Owners
Association, Inc., is Respondent,

v.

Ephesian Ventures, LLC, Appellant.

MOTION FOR EXTENSION OF TIME

The respondent respectfully moves for a further fifteen-day extension of time, on the following grounds:

1. Following this Court's order denying respondent's motion to dismiss the appeal, the undersigned was retained by respondent and its trial counsel to assist in respondent's representation on appeal. The undersigned was assigned the task of drafting the brief of respondent in response to the 33-page brief of the appellant.

2. The trial record is lengthy, as is the order under appeal. The undersigned therefore requested and obtained from the Court a thirty-day extension of time for service and filing of respondent's initial brief and designation, to August 22, 2018.

3. Substantial progress has been made. However, because of the complexity of the issues, together with a substantial schedule of work in other matters, it is apparent that the work cannot be completed by the presently extended due-date.

✓

4. For these reasons, the respondent moves the Court to grant a further extension of fifteen days, to and including September 6, 2018, for service and filing of respondent's initial brief and designation.

Respectfully submitted,

Wm. Weston Jones Newton
F. Ward Borden
~~Jones Simpson & Newton~~
P. O. Box 1938
Bluffton, South Carolina 29910
843-706-6111

James B. Richardson, Jr.
1229 Lincoln Street
Columbia, South Carolina 29201
803-799-9412

by: James B. Richardson, Jr.
Attorneys for Respondent.

August 15, 2018.

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Of which The Edgewater on Broad Creek Owners
Association, Inc., is Respondent,

v.

Ephesian Ventures, LLC, Appellant.

CERTIFICATE OF SERVICE

The undersigned certifies that he served a copy of respondent's motion of August 15, 2018, for an extension of briefing time upon appellant's attorneys by first class mail, postage prepaid, addressed to them at their address of record, namely:

M. Dawes Cooke, Jr., Esq.
K. Michael Barfield, Esq.
Barnwell Whaley Patterson & Helms
P. O. Drawer H
Charleston, SC 29402

James B. Richardson, Jr.
James B. Richardson, Jr.
1229 Lincoln Street
Columbia, South Carolina 29201
803-799-9412

August 15, 2018.

Attorneys for Respondent.

**Law Office of
James B. Richardson, Jr.**

1229 LINCOLN STREET
COLUMBIA, SOUTH CAROLINA 29201

TELEPHONE 803/799-9412

August 15, 2018

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SC Court of Appeals

Honorable Jenny A. Kitchings
Clerk of the S.C. Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

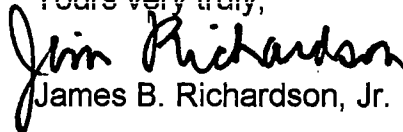
Re: The Edgewater v. Ephesian Ventures
Appellate Case No. 2016-001789

Dear Ms. Kitchings:

Enclosed for filing is respondent's motion for an additional fifteen-day extension of time, to and including September 6, 2018, for service and filing of respondent's initial brief and designation.

Thanking you, I remain

Yours very truly,


James B. Richardson, Jr.

cc: M. Dawes Cooke, Jr., Esq.
K. Michael Barfield, Esq.
William Weston Jones Newton, Esq.
F. Ward Borden, Esq.
Michael W. Mogil, Esq.

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James B. Richardson, Jr.
Attorney at Law
1229 Lincoln Street
Columbia, South Carolina 29201

TO:

Honorable Jenny A. Kitchings
Clerk of the South Carolina
Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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