

87936

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Cynthia Graham Howe, Master-In-Equity

APPELLANT CASE NO. 2018-001590

**RECEIVED**  
SEP 26 2018  
SC Court of Appeals

Andrew Waldo; Jane Zheng; and SC Coast Properties, LLC d/b/a  
Keller Williams Realty..... Respondents

vs.

Michael Cousins; Founders Five, LLC d/b/a Sperry Van Ness Founders  
Group; and South Carolina Association of REALTORS.....Defendants

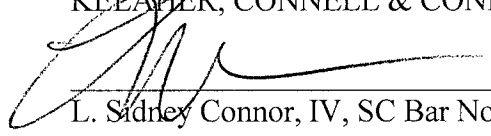
Of Whom Michael Cousins; Founders Five, LLC d/b/a  
Sperry Van Ness Founders Group are.....Appellants

**MOTION TO EXTEND TIME TO FILE  
APPELLANTS' INITIAL BRIEF AND  
DESIGNATION OF MATTER**

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellants, moves this Court for an Order granting an extension of time to file Appellants' Initial Brief and Designation of Matter in the captioned case. Appellants received the transcript of record on August 30, 2018. Under the Rules, Initial Brief and Designation of Matter would be due Friday, September 28, 2018. Appellant's counsel had to close his law office for a week because of the Governor's mandatory evacuation order. This closure has caused a significant delay in legal work

in counsel's office and respectfully requests the Court grant him until October 29, 2018 to file Appellants' Initial Brief and Designation of Matter.

Respectfully submitted,  
KELAHER, CONNELL & CONNOR, P.C.



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L. Sidney Connor, IV, SC Bar No. 1363  
Post Office Drawer 14547  
Surfside Beach, SC 29587-4547  
T: (843) 238-5648  
[sconnor@classactlaw.net](mailto:sconnor@classactlaw.net)

**ATTORNEY FOR APPELLANTS**  
**MICHAEL COUSINS; FOUNDERS FIVE, LLC D/B/A**  
**SPERRY VAN NESS FOUNDERS GROUP**

September 24, 2018

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Cynthia Graham Howe, Master-In-Equity

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Group; and South Carolina Association of REALTORS.....Defendants

Of Whom Michael Cousins; Founders Five, LLC d/b/a  
Sperry Van Ness Founders Group are.....Appellants


PROOF OF SERVICE

PERSONALLY appeared before me, Lynn C. Benton, who being duly sworn, deposes and says that she is an employee of KELAHER, CONNELL & CONNOR, P.C., Attorneys at Law, and that she has served the Appellants' **MOTION TO EXTEND TIME TO FILE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER** on the Respondents, through its attorney of record, by depositing a copy of same in the United States Mail, postage prepaid, to:

**Douglas M. Zayicek, Esquire**  
**The Bellamy Law Firm**  
**Post Office Box 357**  
**Myrtle Beach, SC 29578**

Date of Mailing: September 25, 2018

  
Lynn C. Benton

SWORN to before me this  
25<sup>th</sup> day of September, 2018  
  
Notary Public for South Carolina  
My Commission Expires: 8-10-2021

**KELAHER, CONNELL & CONNOR, P.C.**

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER\*  
GENE M. CONNELL, JR.  
L. SIDNEY CONNOR, IV  
LISA POE DAVIS

\* OF COUNSEL

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238-5648

FAX: 238-5050

September 24, 2018

**RECEIVED**

SEP 26 2018

SC Court of Appeals

Jenny Abbott Kitchings  
The South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**Re: Andrew Waldo, Jane Zheng and SC Coast Properties, LLC d/b/a Keller Williams Realty v. Michael Cousins, Founders Five, LLC d/b/a Sperry Van Ness Founders Group, and South Carolina Association of REALTORS  
APPELLANT CASE NO. 2018-001590**

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Appellants' Motion to Extend Time to File Appellant's Initial Brief and Designation of Matter and Proof of Service in the above-captioned matter. I also enclose a check for \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Very truly yours,

L. Sidney Connor, IV

LSCIV:lb

Enclosures

cc w/encl.: Douglas M. Zayicek, Esquire

cc w/ encl.: Marcus A. Manos, Esquire

✓

**KELAHER, CONNELL & CONNOR, P.C.**

ATTORNEYS AT LAW

P. O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

**RECEIVED**

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**SC Court of Appeals**

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