

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
OCT 22 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

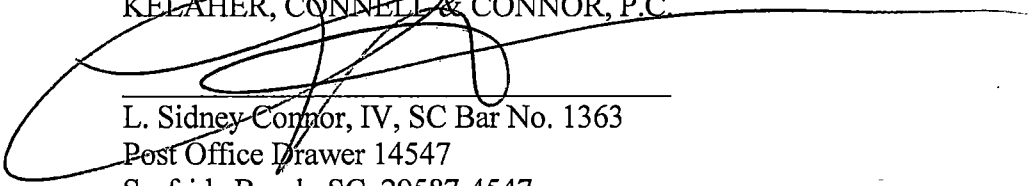
Of Whom Michael Cousins; Founders Five, LLC d/b/a
Sperry Van Ness Founders Group are.....Appellants

**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. The Court has granted an extension until October 29, 2018 to file Appellants'

Initial Brief and Designation of Matter. The **Appellant hereby requests an additional extension until December 14, 2018.**

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



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

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

October 18, 2018

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
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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: October 19, 2018


Lynn C. Benton

SWORN to before me this
19th day of October, 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

AREA CODE 843
238-5648
FAX: 238-5050

October 18, 2018

RECEIVED

OCT 22 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 \$50.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

The Court has so graciously granted an extension until October 29, 2018. However, we are requesting an additional extension until December 14, 2018.

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

With highest 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

J



KELAHER, CONNELL & CONNOR, P.C.
ATTORNEYS AT LAW
P. O. DRAWER 14547
SURFSIDE BEACH, SOUTH CAROLINA 29587

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