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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Charles B. Simmons, Jr., Master In Equity

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SC Court of Appeals

Appellate Case No. 2018-001209
Common Pleas Case No. 2017-CP-23-6301

Raymond A. Wedlake, individually and
derivatively, on behalf of all Members of
Woodington Homeowners' Association, Inc.Appellant,

v.

Benjamin Acord, William Craigo, Denis
Esteve, and Brian James in their capacity
as the current Board of Directors of the
Woodington Homeowners' Association, Inc.
and
Association Management Group SC, Inc. Respondents.

**MOTION FOR FIRST EXTENSION OF TIME TO SERVE AND FILE
RESPONDENTS' INITIAL BRIEF AND DESIGNATION
OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Ely O. Grote, Esq.
MCCABE, TROTTER & BEVERLY, P.C.
4500 Fort Jackson Blvd., Suite 250 (29209)
P.O. Box 212069, Columbia, SC 29221
Telephone: (803) 724-5000
Facsimile: (803) 724-5001
Email: Ely.Grote@mccabetrotter.com
ATTORNEY FOR RESPONDENTS

Pursuant to Rule 263(b), SCACR, Respondents hereby move for a 30-day extension of time in which to serve and file Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal. The grounds for this Motion are as follows:

1. The deadline for service and filing of Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal is currently November 12, 2018. With the requested extension, the deadline would become December 12, 2018.

2. This is the first extension that Respondents have sought in this Appeal.

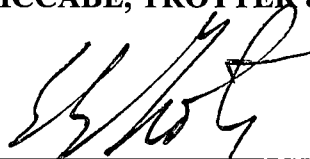
3. Appellant's counsel has consented to the requested extension, as evidenced by the emails attached as **Exhibit A** and incorporated herein by reference.

4. Such extension is necessary in order to allow counsel to fully and adequately prepare Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal.

WHEREFORE, Respondents pray for an Order extending the time in which to serve and file Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal to December 12, 2018.

Respectfully submitted,

MCCABE, TROTTER & BEVERLY, P.C.



Ely O. Grote, SC Bar 75379
MCCABE, TROTTER & BEVERLY, P.C.
4500 Fort Jackson Blvd., Suite 250 (29209)
P.O. Box 212069, Columbia, SC 29221
Phone: (803) 724-5000 Fax: (803) 724-5001
Email: Ely.Grote@mccabetrotter.com
ATTORNEY FOR RESPONDENTS

November 2, 2018
Columbia, South Carolina

Exhibit A

Ely Grote

From: Grant Gibson <atty@ggibsonassociates.com>
Sent: Tuesday, October 30, 2018 6:54 PM
To: Ely Grote
Cc: Grant
Subject: Re: Raymond Wedlake Appeal - extension request

I am in Virginia helping my wife with arrangements for her Father - the funeral is Thursday.
I will of course, consent and while I realize 30 days is standard, if you wish 45 days please me know

Sent from my iPhone

On Oct 30, 2018, at 5:51 PM, Ely Grote <Ely.Grote@mccabetrotter.com> wrote:

Mr. Gibson,

Would you please consent to an extension for Respondents to file their initial brief? By my calculations, Respondents' initial brief is due 10/12. I am respectfully requesting consent to a 30 day extension, which would make the Respondents' initial brief due on or before 12/12. Please let me know if you will consent. Thank you for your consideration.

Ely O. Grote
Attorney
McCabe, Trotter & Beverly, P.C.
4500 Fort Jackson Boulevard
Suite 250
Columbia, SC 29209
Main: 803-724-5000
Direct: 803-724-5018
Fax: 803-724-5001
Email: ely.grote@mccabetrotter.com

<image001.jpg>

Please note that our office has moved. Effective February 26, 2018, our new address is:
4500 Fort Jackson Blvd., Suite 250 Columbia, SC 29209

Thank you for your patience during our transition.

NOTICES

PRIVILEGED AND CONFIDENTIAL: This electronic message (including any attachments) is intended only for the use of the individual or entity to which it is addressed and may contain information that is attorney-client privileged, may be confidential work product, or may be exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended

Exhibit A

Ely Grote

From: Grant Gibson <atty@ggibsonassociates.com>
Sent: Friday, November 02, 2018 9:50 AM
To: Ely Grote
Cc: Grant Gibson
Subject: Re: Raymond Wedlake Appeal - extension request
Attachments: Revise Consent to Respondents' first extension.pdf

Mr. Grote:

You have my consent, as counsel for Appellant, Raymond Wedlake, to the 30-day extension request regarding Wedlake et al, v. Accord, et al, Appellate Case No 2018-001209

Common Pleas Case No 2017-CP-23-6301

Thank you,

Grant H. Gibson, Esq.

From: Ely Grote <Ely.Grote@mccabetrotter.com>
To: Grant Gibson <atty@ggibsonassociates.com>
Sent: Wednesday, October 31, 2018 3:51 PM
Subject: RE: Raymond Wedlake Appeal - extension request

I have attached a revised consent. Please disregard the prior consent form and use this one instead. Thanks.

Ely O. Grote
Attorney
McCabe, Trotter & Beverly, P.C.
4500 Fort Jackson Boulevard
Suite 250
Columbia, SC 29209
Main: 803-724-5000
Direct: 803-724-5018
Fax: 803-724-5001
Email: ely.grote@mccabetrotter.com



McCABE, TROTTER & BEVERLY, P.C.
COMMUNITY ASSOCIATION AND CONSTRUCTION LAW

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STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
IN THE COURT OF COMMON PLEAS FOR THE 13TH JUDICIAL CIRCUIT

Charles B. Simmons, Jr., Master In Equity

Appellate Case No. 2018-001209
Common Pleas Case No. 2017-CP-23-6301

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Raymond A. Wedlake, individually and
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Woodington Homeowners' Association, Inc. Appellant,

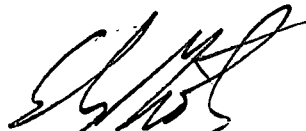
v.

Benjamin Acord, William Craigo, Denis
Esteve, and Brian James in their capacity
as the current Board of Directors of the
Woodington Homeowners' Association, Inc.
and
Association Management Group SC, Inc. Respondents.

PROOF OF SERVICE

I, Ely O. Grote, certify that I have served, or caused to be served, Motion for First Extension of Time to Serve and File Respondents' Initial Brief and Designation of Matter to be included in the Record on Appeal, on counsel for Appellant, Grant H. Gibson by depositing one copy of the same in the United States mail, postage prepaid, addressed as follows:

Grant H. Gibson, Esq.
G. Gibson & Associates, LLC
1200 Woodruff Road, A-3
Greenville, South Carolina 29607
atty@ggibsonassociates.com



Ely O. Grote, SC Bar No. 75379
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Email: Ely.Grote@mccabetrotter.com
ATTORNEY FOR RESPONDENTS

November 2, 2018; Columbia, SC

Physical Address:
4500 Fort Jackson Blvd., Suite 250
Columbia, South Carolina 29209

Mailing Address:
Post Office Box 212069
Columbia, SC 29221

Locations in:
Mount Pleasant, SC
Myrtle Beach, SC



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Fax: (803) 724-5001

Ely O. Grote
Shareholder

Ely.Grote@mccabetrotter.com
Direct: (803) 724-5018

November 2, 2018

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
Post Office Box 11629 (29211)
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED
NOV 02 2018
SC Court of Appeals

Re: Raymond A. Wedlake v. Benjamin Acord
Appellate Case No. 2018-001209
MTB File No.: 017402.00009

Dear Ms. Kitchings:

Enclosed, please find original and six copies of Motion for First Extension of Time to Serve and File Respondents' Initial Brief and Designation of Matter to be included in the Record on Appeal. Also enclosed, is this firm's check in the amount of \$50.00 for associated filing fee. Please have a member of your staff file said Motion and return file-stamped copy to me in the envelope provided herewith.

Should you have any questions or concerns, please do not hesitate to contact me.

Respectfully,

Ely O. Grote

/bdp

Enclosures

cc: Grant H. Gibson, Esq. (via U.S. Mail and email, w/ enclosures)

J