

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE BEAUFORT COUNTY
COURT OF COMMON PLEAS

HONORABLE MARVIN H. DUKES, III
BEAUFORT COUNTY MASTER-IN-EQUITY AND
SPECIAL CIRCUIT COURT JUDGE

RECEIVED

DEC 03 2018

SC Court of Appeals

CASE NO.: 2014-CP-07-0052
APPELLATE CASE NO.: 2018-001969

Lady Beaufort, LLC &
Tideland Realty, Inc.

Respondents/Appellants,

vs.

Hird Island Investments, Inc., Sherwood N. Fender,
Addison D. Fender, Martha B. Fender, William B. Bowen,
Lady Kemmerlin, LLC, Brickyard Holdings, Inc. and
A&K Holding Co., LLC,

Defendants,

AND

William M. Bowen,

Third-Party Plaintiff,

v.

James S. Kerr and Matt Trumps,

Third-Party Defendants,

Of Which Hird Island Investments, Inc.
and Sherwood N. Fender are

Appellants/Respondents.

NOTICE OF MOTION AND MOTION FOR
EXTENSION OF TIME TO FILE APPELLANTS/RESPONDENTS
INITIAL BRIEF AND DESIGNATION OF MATTER TO
BE INCLUDED IN RECORD ON APPEAL

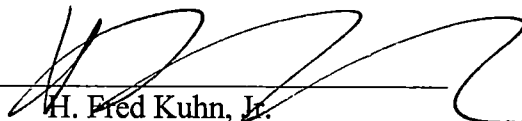
The Appellants/Respondents would respectfully request an extension of time within which to file the Initial Brief Designation of Matter to be Included in the Record on Appeal. These matters are currently due to be filed no later than November 29, 2018. The Appellants/Respondents would respectfully request a thirty (30) day extension of time in which to file the same.

This motion is made upon the ground that an extension as requested would be in the best interest of justice, and would not prejudice the Respondents/Appellants.

It is accordingly respectfully requested that the Appellants/Respondents be granted a thirty (30) day extension of time in which to file the Initial Brief and Designation of Matter to be Included in the Record on Appeal.

MOSS, KUHN & FLEMING, P.A.

By:



H. Fred Kuhn, Jr.
1501 North Street
Post Office Drawer 507
Beaufort, South Carolina 29901
(843)524-3373
(843)524-1302- FX

Beaufort, South Carolina
November 29, 2018

Attorneys for Appellants/Respondents

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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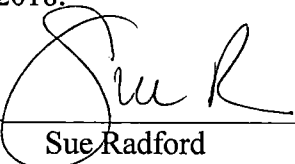
CERTIFICATE OF SERVICE

Undersigned certifies that the **Notice of Motion and for Extension of Time to File Appellants/Respondents' Initial Brief and Designation of Mater to be Included in Record**

on Appeal, to which this certificate is affixed, was served upon the party (s) to this action by hand delivery or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

Andrew K. Epting, Jr., Esquire
Jaan G. Rannik, Esquire
46A State Street
Charleston, South Carolina 29401
Attorneys for the Respondent
Lady of Beaufort, LLC

in a post office or official depository under the exclusive care and custody of the United States Postal Service, on November 29, 2018.

By: 
Sue Radford

LAW OFFICES
MOSS, KUHN & FLEMING P.A.

JAMES H. MOSS
H. FRED KUHN, JR.
CORY H. FLEMING*

1501 North Street P.O. Drawer 507~Beaufort, South Carolina 29901-0507
TELEPHONE 843-524-3373
FAX 843-524-1302

*ALSO MEMBER OF GA BAR

November 29, 2018

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

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SC Court of Appeals

RE: Lady Beaufort, LLC & Tideland Realty, Inc. v. Hird Island Investments, et al.
Case No.: 2014-CP-07-0052
Appellate Case No.: 2018-001969

Dear Mrs. Kitchings:

Enclosed please find the original and seven (7) copies of the Notice of Motion and Motion for Extension of Time to File Appellants/Respondents' Initial Brief and Designation of Matter to be Included in Record on Appeal regarding the above-referenced matter along with my firm's check in the amount of \$25.00 for the filing of the same. I would appreciate your returning one (1) filed copy to me in the enclosed self-addressed stamped envelope. By copy of this letter I am serving a copy of the motion on Andrew K. Epting, Esquire and Jaan Gunnar Rannik, Esquire.

With kindest regards, I am

Very truly yours,

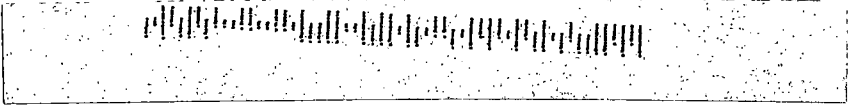
MOSS, KUHN & FLEMING, P.A.


H. Fred Kuhn, Jr.

HFKjr:sr
Enclosures

cc: Andrew K. Epting, Esquire (w/enclosure)
Jaan Gunnar Rannik, Esquire (w/enclosure)

✓



MOSS, KUHN & FLEMING, P.A.
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To:

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Clerk, South Carolina Court of Appeals
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