

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
In the Court of Common Pleas for the Fourteenth Circuit

J. Ernest Kinard, Jr., Circuit Court Judge

Appellate Case No. 2015-00002

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DEC 11 2018
SC Court of Appeals

The Callawassie Island Members Club, Inc.,

Respondent,

v.

Michael J. Frey and Grace I. Frey,

Appellants.

MOTION FOR AN EXTENSION

On November 30, 2018, this Court issued its Order granting the Appellants' and the Respondent's petitions for rehearing. In light of the Supreme Court's recent ruling in *The Callawassie Island Members Club, Inc. v. Dennis*, the Court gave the parties permission to file supplemental briefs. This Court's Order allows the parties 30 days in which to serve and file any such supplemental briefs, which would make those briefs due on December 31, 2018.

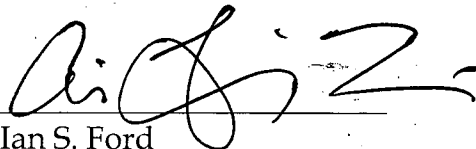
The Appellants respectfully request that they would be given a 30-day extension until January 30, 2019, in which to file their supplemental brief in this appeal. The grounds for this motion include (1) the complexity of the issues on appeal, (2) the

additional analysis that is required in light of the *Dennis* ruling, (3) numerous other briefing deadlines for undersigned counsel during the time-period, including briefs due to the Fourth Circuit Court of Appeals and to the United States District Court, District of South Carolina, as well as (4) the time constraints presented by the upcoming holiday season.

Appellants have consulted with counsel for the Respondent regarding this extension, but at this writing have not received a response regarding whether Respondent consents or not. Appellants have no objection to the extension applying to all parties to this appeal.

Respectfully submitted,

FORD WALLACE THOMSON LLC



Ian S. Ford

Neil D. Thomson

Ainsley F. Tillman

715 King St., Charleston, South Carolina 29403

(843) 277-2011

*Attorneys for Respondents Michael J. Frey and
Grace I. Frey*

December ^{10th}, 2018
Charleston, South Carolina

IN THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM BEAUFORT COUNTY
In the Court of Common Pleas for the Fourteenth Circuit

J. Ernest Kinard, Jr., Circuit Court Judge

Appellate Case No. 2015-000002

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The Callawassie Island Members Club, Inc. Respondents,

v.

Michael J. Frey and Grace I. Frey Appellants.

PROOF OF SERVICE

I certify that I have served the Motion for Extension on all counsel of record by depositing a copy of it in the United States Mail, postage prepaid, on December 10, 2018, addressed to their attorneys of record:

Stephen P. Hughes, Esq.
Howell, Gibson and Hughes
P.O. Box 40
Beaufort, SC 29901

M. Dawes Cooke, Jr., Esq.
John Fletcher, Esq.
Barnwell Whaley Patterson & Helms, LLC
P.O. Drawer H
Charleston, SC 29402

Andrew F. Lindemann, Esq.
Davidson & Lindemann, P.A.
P.O. Box 8568
Columbia, SC 29202

FORD WALLACE THOMSON LLC



Ian S. Ford, Esq.

Neil D. Thomson, Esq.

715 King Street

Charleston, SC 29403

T. 843.277.2011

Attorneys for Respondents Ronnie D. Dennis and

Jeanette Dennis

FORD WALLACE THOMSON LLC

ATTORNEYS AT LAW

December 10, 2018

VIA FEDERAL EXPRESS: OVERNIGHT DELIVERY

Jenny Abbot Kitchings, Clerk
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: *The Callawassie Island Members Club Inc. vs. Gregory L. Martin*
Beaufort County Case No.: 2012-CP-07-03218
SC Court of Appeals Case No.: 2015-000001

The Callawassie Island Members Club Inc. vs. Mary K. Quinn
Beaufort County Case No.: 2012-CP-07-03216
SC Court of Appeals Case No.: 2015-000003

The Callawassie Island Members Club Inc. vs. Michael J. Frey
Beaufort County Case No.: 2012-CP-07-03209
SC Court of Appeals Case No.: 2015-000002

Dear Jenny:

Enclosed for filing please find the original and one copy each of the Motion for Extension in each of the above referenced matters, along with a \$25 check for the filing fees for each matter. If you would return the copy to us in the self-addressed stamped envelope provided for your convenience.

By copy of this letter, I am serving all counsel of record with the same.

Thank you in advance for your assistance with this matter. Should you have any questions or concerns, please do not hesitate to contact my office.

With kind regards, I am,

Very truly yours,



Ian S. Ford

ISF/smb

Enc. - as stated

cc: M. Dawes Cook, Jr., Esq.
Stephen Hughes, Esq.
Andrew Lindermann, Esq.

ORIGIN ID: RBWA (843) 277-2011
SANDIE BROYLES
FORD WALLACE THOMSON LLC
715 KING STREET

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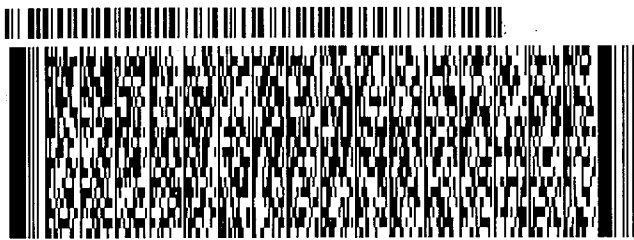
TO SC COURT OF APPEALS

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COLUMBIA SC 29201

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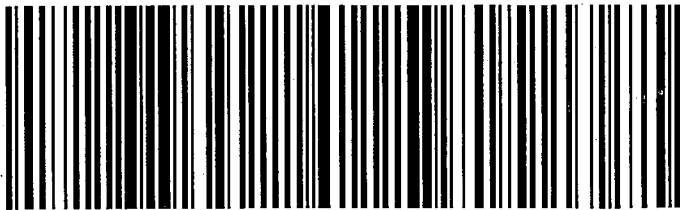


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SC Court of Appeals

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