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**THE STATE OF SOUTH CAROLINA**  
In The Court of Appeals

JAN 09 2019

SC Court of Appeals

**APPEAL FROM BEAUFORT COUNTY**  
Court of Common Pleas  
The Honorable Marvin H. Dukes, III, Master in Equity

Case No. 2014-CP-07-0052  
Appellate Case No. 2018-001969

Lady Beaufort, LLC & Tideland Realty, Inc.,..... *Respondents/Appellants,*

v.

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 the  
Appellants/Respondents.*

**MOTION FOR EXTENTION OF TIME**

Respondents/Appellants' Initial Reply Brief and Designation of Matter are currently due on or before January 14, 2019 in the above-referenced appeal. The undersigned respectfully requests a 30-day extension of time (i.e., until February 14, 2019) to file and serve the Initial Reply Brief and Designation of Matter.

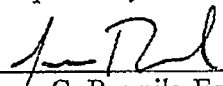
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Additionally, Respondents/Appellants' Initial Brief and Designation of Matter in response to Appellants/Respondents' Initial Brief are currently due on or before January 28, 2019. The undersigned respectfully requests a 30-day extension of time (i.e., until February 27, 2019) to file the Initial Brief and Designation of Matter in response to Appellants/Respondents' Initial Brief.

The grounds for this motion are due to Respondents/Appellants' counsels' caseload, including a week-long trial commencing January 21, 2019.

January 8, 2019  
Charleston, SC

Respectfully submitted,

  
\_\_\_\_\_  
Jaan G. Rannik, Esquire  
Andrew K. Epting, Jr., Esquire  
ANDREW K. EPTING, JR., LLC  
46A State Street, Charleston, SC 29401  
P: (843) 377-1871  
F: (843) 377-1310  
[ake@epting-law.com](mailto:ake@epting-law.com)  
[jgr@epting-law.com](mailto:jgr@epting-law.com)

*ATTORNEYS FOR RESPONDENTS/APPELLANTS*

## ANDREW K. EPTING, JR., LLC

ATTORNEYS AT LAW

ANDREW K. EPTING, JR. · AKE@EPTING-LAW.COM

JAAN G. RANNIK · JGR@EPTING-LAW.COM

January 8, 2019

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29201

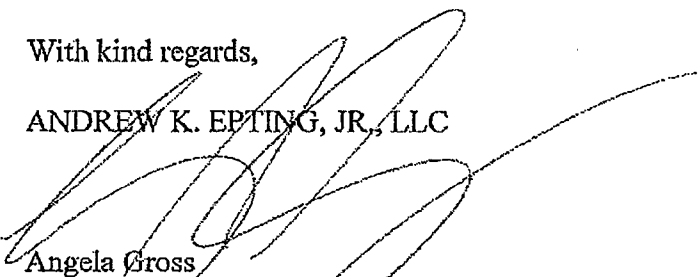
RE: *Lady Beaufort, LLC & Tidelands Realty, Inc. v. Hird Island Investments, Inc. and  
Sherwood Fender*  
Case No.: 2014-CP-07-0052  
Appellate Case No.: 2018-001969

Dear Ms. Kitchings:

Enclosed please find An original and seven (7) copies of the Respondents/Appellants' Motion for Extension of Time, together with a Proof of Service in the above-referenced appeal. I have also enclosed our firm's check in the amount of \$50.00. I would greatly appreciate your filing the original Motion and returning a file-stamped copy in the self-addressed, stamped envelope provided.

With kind regards,

ANDREW K. EPTING, JR., LLC



Angela Gross  
Legal Assistant to Jaan G. Rannik  
and Andrew K. Epting, Jr.,

/agg

Enclosures – as stated

cc: William M. Bowen, Esquire  
Fred H. Kuhn, Jr., Esquire

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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 the  
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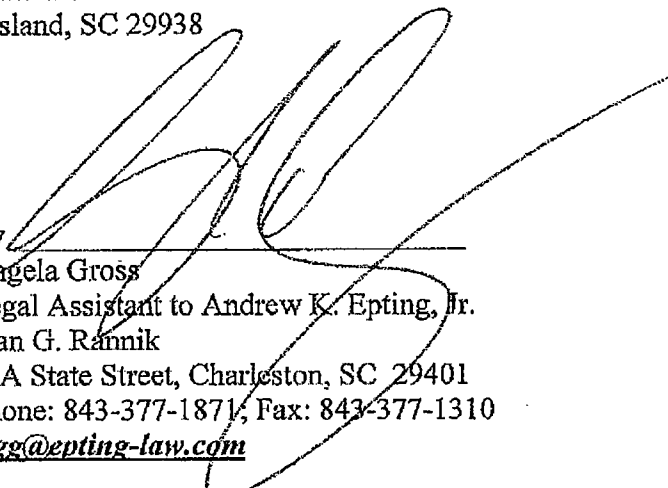
**PROOF OF SERVICE**

I certify that I have served the Respondents/Appellants' Motion for Extension of Time by depositing a copy in the United States Mail, Postage prepaid, on January 9, 2019, addressed to Appellants/Respondents' attorneys of record as follows:

H. Fred Kuhn, Jr., Esquire  
P.O. Drawer 507  
Beaufort, SC 29901

and

William M. Bowen, Esquire  
WILLIAM M. BOWEN, P. A.  
P.O. Drawer 6128  
Hilton Head Island, SC 29938



By \_\_\_\_\_  
Angela Gross  
Legal Assistant to Andrew K. Epting, Jr.  
Jaan G. Rannik  
46A State Street, Charleston, SC 29401  
Phone: 843-377-1871; Fax: 843-377-1310  
[agg@epting-law.com](mailto:agg@epting-law.com)

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SC Court of Appeals

**FAX COVER SHEET**

TO	
COMPANY	
FAX NUMBER	18037341839
FROM	Andrew K Epting
DATE	2019-01-09 14:15:55 GMT
RE	Appellate Case No. 2018-001969

**COVER MESSAGE**

Dear Ms. ~~Abbott Kitchings~~,

Attached please find Respondents/Appellants' Motion for an Extension of Time in the above-referenced appeal. The originals together with the motion fee are being send by United States Priority Mail. Note, I have copied opposing counsel.

Thank you.

*Angela*

Angela Gross  
Legal Assistant to Andrew K. Epting, Jr., Esquire  
Jaan G. Rannik, Esquire  
Andrew K. Epting, Jr., LLC  
46A State Street  
Charleston, SC 29401  
Telephone: (843) 377-1871  
Facsimile: (843) 377-1310  
[agg@epting-law.com](mailto:agg@epting-law.com)

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