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JAN 22 2019

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Greenville County
The Honorable C. Simmons, Master in Equity

Raymond A. Wedlake, individually and
derivatively, on behalf of all Members of the
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

Appellate Case No. **2018-001209**
Civil Action # **2017-CP-23-06301**

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO RESPONDENT'S
INITIAL BRIEF**

Appellant, Raymond A. Wedlake, individually and derivatively, on behalf of all Members of the Woodington Homeowners' Association, Inc., by and through its counsel, respectfully moves this Court for an additional ten (10) day extension of time in which to file the Reply Brief in Response to Respondent's Initial Brief. Appellant, through the undersigned counsel for Appellant, would respectfully show the Court:

1. Counsel for Appellant requests such extension on the following grounds:
 - A. Although Respondents letter and the date stamp on the envelope are both dated

January 11, 2019, neither counsel for Appellant, nor Appellants, received the envelope, which came via regular mail, until this afternoon, January 17, 2019;


- B. Counsel for Appellant has a medical procedure tomorrow that requires general anesthetic and he will be indisposed thereafter; and,
- C. Counsel for Appellant's wife's family is arriving this weekend, during this post-procedure period, and Counsel for Appellant is required to assist in preparation for their arrival prior to undergoing the procedure.

Counsel for Appellant advised counsel for Respondent, Ely Grote, Esq., who is copied on this Motion, of his need for an extension and understands Ely Grote, Esq. has no objection thereto.


THEREFORE, based upon the foregoing, the undersigned counsel for Appellant respectfully petitions this Court for an additional extension of ten (10) days to complete the Reply to counsel for Respondent's Initial Brief.

Respectfully submitted,

GRANT H. GIBSON, ESQ.
Counsel for Appellant



Grant H. Gibson, Esq.

January 17, 2019 

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The Honorable C. Simmons, Master in Equity

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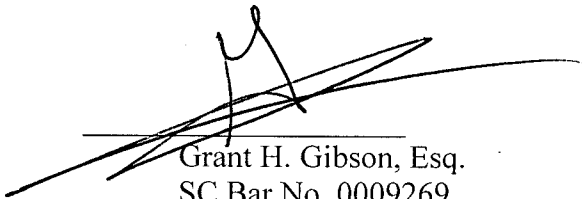
Appellate Case No. **2018-001209**
Civil Action # **2017-CP-23-06301**

PROOF OF SERVICE

I, Grant H. Gibson, Esq., certify that I have served Appellant's Motion an Extension of Time on counsel for Respondents, Ely Grote, Esq., by depositing one copy of the same in the United States mail, postage prepaid, addressed as follows:

Ely Grote, Esq. – Attorney
McCabe, Trotter & Beverly PC
4500 Fort Jackson Boulevard – Suite 250.
Columbia, SC 29209

This ^{12/10} day of January 2019
g/h



Grant H. Gibson, Esq.
SC Bar No. 0009269
1200 Woodruff Rd. A-3
Greenville, SC 29607
864-630-7471
ATTORNEY FOR APPELLANT

GRANT H. GIBSON, ESQ. –

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SC Court of Appeals

Grant H. Gibson, Esq.
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Greenville, SC 29627
661 W. Johns Creek Pkwy.
Residence: St. Augustine, Fl. 32092
Cell: 864-630-7471
Fax: 866-667-2509
atty@ggibsonassociates.com

Date: January 18, 2019

To: The Honorable Jenny Abbot Kitchings – Clerk of SC Ct. of Appeals

From: Grant H. Gibson, Esq.
cc. Raymond Wedlake, Ely Grote, Esq.

Subject: *Raymond A. Wedlake v. Benjamin Acord, et al* – Motion & Request for Extension for Time to File Appellant's Reply to Respondent's Initial Brief Appellate Case No. 2018-001209


The undersigned, Grant H. Gibson, Esq., attorney for Appellant, Raymond Wedlake, respectfully requests an extension of ten (10) days in which to file Appellant's response to Respondent's Initial Brief, for the reasons set forth in the attached Motion, which include the fact I am undergoing a medical procedure early this morning under general anesthesia.

Enclosed is my law-office check for the Filing Fee of \$50.

Please note that I have sent a copy of this Motion to Ely Grote, Esq., counsel for Respondent, after speaking with him yesterday to advise him in advance of this Motion and Request for Extension. Accordingly, a Certificate of Service is attached evidencing the mailing of such Motion to counsel for Respondent.

If you have any questions, please give me a call at: 864-630-7471.

Thank you very much,


Grant H. Gibson, Esq. - Bar # 0009269

✓

Grant Gibson, Esq
661 W Johns Creek Pkwy
St. Augustine, FL
32092

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JAN 22 2019

SC Court of Appeals

The Honorable Jenny Kitchings
Clark of Ct. South Carolina Court of Appeals
P.O. Box 11629 (29211)
1220 Senate Street
Columbia, SC 29201