

STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC 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 SECOND 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. Counsel for Appellant's recent medical procedure, that required general

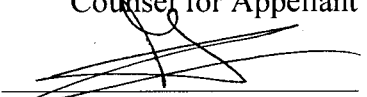
anesthetic, and was the basis for the initial extension request, required a longer recovery period than initially anticipated

- B. Counsel for Appellant has conferred with Counsel for Respondent, Ely Grote, Esq., who is copied on this Motion, of his need for this second extension and Ely Grote, Esq. has stated that he has no objections 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 30, 2018

88939

GRANT H. GIBSON, ESQ.

Grant H. Gibson, Esq.
Office: 1200 Woodruff Rd. A-3
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 30, 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
a **SECOND Extension for Time to File Appellant’s Reply to Respondent’s
Initial Brief Appellate Case No. 2018-001209**

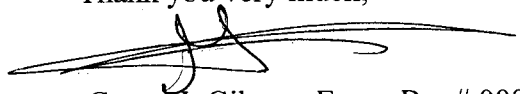
The undersigned, Grant H. Gibson, Esq., attorney for Appellant, Raymond Wedlake, respectfully requests a Second extension of ten (10) days in which to file Appellant’s response to Respondent’s Initial Brief, for the reasons set forth in the attached Motion, which include the fact that after undergoing a medical procedure requiring general anesthetic very recently it took several days to recuperate and some residual effects continue.

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 to advise him in advance of this request for a Second Extension and the filing of this Motion and he advised that he had no objection to such request or such second 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

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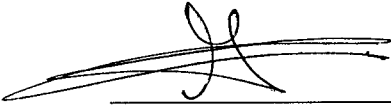
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PROOF OF SERVICE

I, Grant H. Gibson, Esq., certify that I have served Appellant's Motion for a Second Extension of Time to respond to Respondent's Initial Brief, 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 30th day of January 2018



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

G. Gibson, Esq.
661 W. Johns Creek Parkway
St. Augustine, Fl.
32092

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SC Court of Appeals

The Honorable Jerry Abbott Kitchings
Chief Court, South Carolina Court of Appeals
P.O. Box 11629 (29211)
1220 Senate Street
Columbia, SC 29201