

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

FEB 25 2019

**SC Court of Appeals**

\_\_\_\_\_  
Appeal from Horry County  
Court of Common Pleas

Cynthia Graham Howe, Master-In-Equity, Circuit Court Judge

\_\_\_\_\_  
Case No. 2018-001590  
\_\_\_\_\_

Andrew Waldo; Jane Zheng; and SC Coast Properties, LLC d/b/a  
Keller Williams Realty..... Respondents,

v.

Michael Cousins; Founders Five, LLC d/b/a Sperry Van Ness Founders Group;  
and South Carolina Association of REALTORS®..... Appellants.

**APPELLANT SOUTH CAROLINA ASSOCIATION OF REALTORS®' MOTION TO  
EXTEND TIME TO FILE REPLY BRIEF**

\_\_\_\_\_  
YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the  
Appellant South Carolina Association of REALTORS® ("SCAR"), move the Court for an  
Order granting an extension of time to file Appellant's Reply Brief in the above-captioned  
case. The Reply Brief of Appellant SCAR is due on February 25, 2019. Appellant's  
counsel has been traveling to visit his son in a healthcare facility out of state and therefore,  
been unable to devote the necessary time to complete the Reply Brief, and respectfully  
requests the Court grant Appellant SCAR until March 4, 2019 to file Appellant SCAR's  
Reply Brief.

Appellant SCAR's counsel has confirmed with counsel of record regarding this extension and they do not oppose.

*Marcus A. Manos* by *SS*  
101386

Marcus A. Manos, SC Bar No. 11876  
NEXSEN PRUET, LLC  
1230 Main Street, Suite 700 (29201)  
Post Office Drawer 2426  
Columbia, South Carolina 29202  
Telephone: 803.771.8900  
MManos@nexsenpruet.com

Attorneys for Appellant  
South Carolina Association of REALTORS

February 25, 2019

Columbia, South Carolina

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**SC Court of Appeals**

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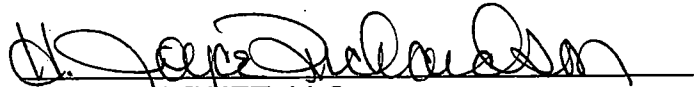
Michael Cousins; Founders Five, LLC d/b/a Sperry Van Ness Founders Group;  
and South Carolina Association of REALTORS®..... Appellants.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

The undersigned hereby certifies that a copy of the **Appellant South Carolina Association Of REALTORS®' Motion To Extend Time To File Reply Brief** has been served upon counsel of record by depositing a copy of the same, first-class postage prepaid, in the United States Mail, on the 25<sup>th</sup> day of February 2019, to the addresses shown below.

Douglas M. Zayicek, Esquire  
THE BELLAMY LAW FIRM  
Post Office Box 357  
Myrtle Beach, South Carolina 29578

L. Sidney Connor, IV, Esquire  
KELAHER, CONNELL & CONNOR, P.C.  
Post Office Drawer 14547  
Surfside Beach, South Carolina 29587-4547

  
NEXSEN PRUET, LLC

Columbia, South Carolina

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FEB 25 2019

February 25, 2019

SC Court of Appeals

Marcus A. Manos  
Member  
Admitted in SC, NC, DC

VIA HAND DELIVERY

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

Re: **Andrew Waldo, Jane Zheng and SC Coast Properties, LLC d/b/a Keller Williams Realty vs. Michael Cousins, Founders Five, LLC d/b/a Sperry Van Ness Founders Group, and South Carolina Association of REALTORS® / Case No. 2018-001590**

Dear Ms. Kitchings:

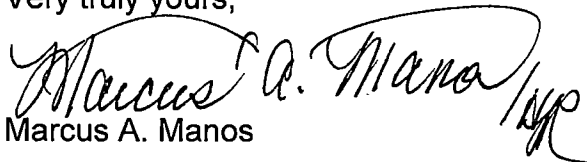
Enclosed for filing are an original and seven (7) copies of **Appellant South Carolina Association of REALTORS®' Motion To Extend Time To File Reply Brief and Proof of Service** in the above-referenced matter. I am also enclosing my firm's check in the amount of \$50.00 for the Motion filing fee. Please return a filed stamped copy to me via our courier.

By copy of this letter and as evidence by the attached Proof of Service, we are serving counsel of record with the above Motion.

Thank you for your assistance in this matter.

With best regards, I am

Very truly yours,

  
Marcus A. Manos

MAM/hjr

Enclosures

cc w/encl.: Douglas M. Zayicek, Esquire  
L. Sidney Connor, IV, Esquire

- Charleston
- Charlotte
- Columbia**
- Greensboro
- Greenville
- Hilton Head
- Myrtle Beach
- Raleigh

