

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM Horry COUNTY
Court of Common Pleas

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Honorable Cynthia Graham Howe, Master-In-Equity

FEB 26 2019

SC Court of Appeals

Appellate 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.

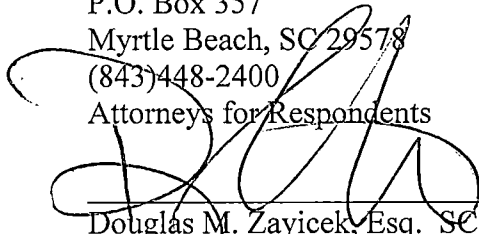
MOTION FOR EXTENSION TO FILE BRIEF OF RESPONDENTS

Respondent hereby requests a thirty (30) day extension of time to file the Brief of Respondents in response to Appellant South Carolina Association of REALTOR's Initial Brief for good cause shown. This request is made in light of heavy case-load and work-related time commitments, is consistent with the interests of justice, and is not unduly prejudicial to the Appellants.

The Brief of Respondent is due March 3, 2019 and if this request is granted, the Brief of Respondent will be due on April 2, 2019. Respondent submits that this Motion for Extension is not intended for purposes of delay.

Respectfully submitted,

BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.
P.O. Box 357
Myrtle Beach, SC 29578
(843)448-2400
Attorneys for Respondents



Douglas M. Zayicek, Esq. SC Bar No. 11304
Holly M. Lusk, Esq., SC Bar No. 102307

Myrtle Beach, South Carolina
Dated: February 25, 2019

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Cynthia Graham Howe, Master-In-Equity

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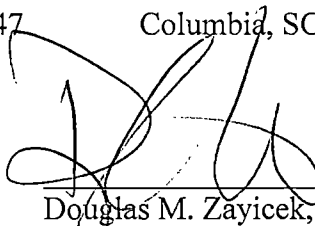
Michael Cousins; Founders Five, LLC d/b/a Sperry Van Ness Founders
Group; and South Carolina Association of REALTORS Appellants.

PROOF OF SERVICE

I certify that I have served the **Motion for Extension to File Brief of Respondent** in response to Appellant South Carolina Association of REALTOR's Initial Brief in the above-captioned matter on the following individuals by depositing a copy in the United States Mail, with sufficient first-class postage affixed, addressed as follows:

L. Sidney Connor, IV, Esq.
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Post Office Drawer 14547
Surfside Beach, SC 29587-4547

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Attorneys for Respondents

Myrtle Beach, South Carolina
Dated: February 25, 2019

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** LICENSED IN SC & NC
+ CERTIFIED MEDIATOR
** CERTIFIED ARBITRATOR



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February 25, 2019

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FEB 26 2019

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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

Dear Ms. Kitchings:

Enclosed for filing please find the Motion for Extension to File Brief of Respondent in response to Appellant South Carolina Association of REALTOR's initial brief in the above-referenced matter. The filing fee in the amount of \$50.00 is enclosed. According to my calculations, should this Petition be granted, Respondent's Initial Brief will be due on or before April 2, 2019. Please let me know immediately if my calculations are incorrect.

I would appreciate you returning a clocked copy of the Proof of Service in the enclosed self-addressed, stamped envelope I have provided for your convenience.

With kindest personal regards, I am

Yours very truly,

BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.


Douglas M. Zayicek

Enclosures as noted

cc: Client
Lawrence Sidney Connor, IV, Esquire
Marcus Angelo Manos, Esquire

✓

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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