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THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

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MAR 29 2019

Honorable Cynthia Graham Howe, Master-In-Equity **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.

CONSENT MOTION FOR EXTENSION TO FILE BRIEF OF RESPONDENTS

Respondent hereby requests an additional twenty (20) 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 and with the consent of counsel for Appellant South Carolina Association of REALTORS. 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 April 2, 2019 and if this request is granted, the Brief of Respondent will be due on April 22, 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

Holly M. Lusk

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

Myrtle Beach, South Carolina
Dated: March 28, 2019

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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.
Kelaher, Connell & Connor, P.C.
Post Office Drawer 14547
Surfside Beach, SC 29587-4547

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(843)448-2400
Attorneys for Respondents

Myrtle Beach, South Carolina
Dated: March 28, 2019

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



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VIA FEDERAL EXPRESS

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

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 Consent 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 22, 2019. Please let me know immediately if my calculations are incorrect.

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

J

March 28, 2019

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With kindest personal regards, I am

Yours very truly,

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

A handwritten signature in cursive script that reads "Nicole M. Richardson". The signature is written in black ink and is positioned above the printed name.

Nicole M. Richardson
Paralegal to Holly M. Lusk

Enclosures as noted

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

300

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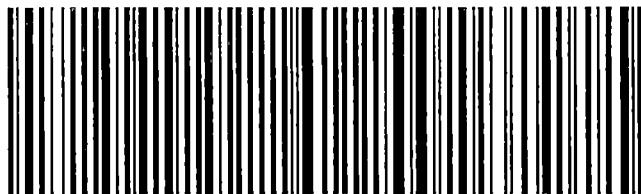
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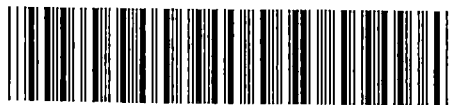
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SC Court of Appeals

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