

89308

IN THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE BEAUFORT COUNTY
COURT OF COMMON PLEAS
HONORABLE MARVIN H. DUKES, III
BEAUFORT COUNTY MASTER-IN-EQUITY AND
SPECIAL CIRCUIT COURT JUDGE

CASE NO.: 2014-CP-07-0052
APPELLATE CASE NO.: 2018-001969

RECEIVED

MAR 18 2019
SC Court of Appeals

Lady Beaufort, LLC &
Tideland Realty, Inc.

Respondents/Appellants,

vs.

Hird Island Investments, Inc., Sherwood N. Fender,
Addison D. Fender, Martha B. Fender, William B. Bowen,
Lady Kemmerlin, LLC, Brickyard Holdings, Inc. and
A&K Holding Co., LLC,

Defendants,

AND

William M. Bowen,

Third-Party Plaintiff,

v.

James S. Kerr and Matt Trumps,

Third-Party Defendants,

Of Which Hird Island Investments, Inc.
and Sherwood N. Fender are

Appellants/Respondents.

NOTICE MOTION AND MOTION FOR EXTENSION OF TIME
TO FILE RECORD ON APPEAL

The Appellant-Respondents would respectfully request an extension of time within which
to file the Record on Appeal. The Record on Appeal is due to be filed no later than March 14,

2019. The Appellant-Respondent would respectfully request a ten (10) day extension of time in which to file the same.

This motion is made upon the ground that an extension as requested would be in the best interest of justice, and would not prejudice the Respondents.

It is accordingly respectfully requested that the Appellant be granted until March 24, 2019 to file the Record on Appeal.

MOSS, KUHN & FLEMING, P.A.

By: 

H. Fred Kuhn, Jr.
1501 North Street
Post Office Drawer 507
Beaufort, South Carolina 29901
(843)524-3373
(843)524-1302- FX

Beaufort, South Carolina
March 14, 2019

Attorneys for Appellants

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Defendants, **SC Court of Appeals**

AND

William M. Bowen,

Third-Party Plaintiff,

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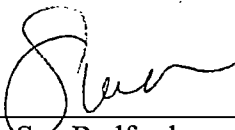
CERTIFICATE OF SERVICE

Undersigned certifies that the **Notion of Motion and Motion for Extension of Time to File the Record on Appeal**, to which this certificate is affixed, was served upon the party (s) to

this action by hand delivery or by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

Andrew K. Epting, Jr., Esquire
Jaan G. Rannik, Esquire
46A State Street
Charleston, South Carolina 29401
Attorneys for the Respondent
Lady of Beaufort, LLC

in a post office or official depository under the exclusive care and custody of the United States Postal Service, on March 14, 2019.

By: 

Sue Radford

LAW OFFICES
MOSS, KUHN & FLEMING P.A.

JAMES H. MOSS
H. FRED KUHN, JR.
CORY H. FLEMING*

1501 North Street P.O. Drawer 507~Beaufort, South Carolina 29901-0507
TELEPHONE 843-524-3373
FAX 843-524-1302

*ALSO MEMBER OF GA BAR

March 14, 2019

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

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MAR 18 2019
SC Court of Appeals

RE: Lady Beaufort, LLC, et al. v. Hird Island Investments, Inc., et al.
Appellate Case No.: 2018-001969

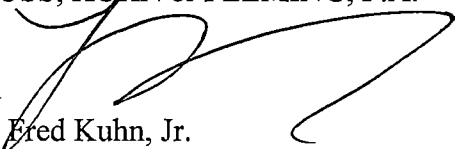
Dear Mrs. Kitchings:

Enclosed please find the original and seven (7) copies of the Appellant-Respondent's Motion for Extension of Time to File the Record on Appeal regarding the above-referenced matter along with my firm's check in the amount of \$50.00 for the filing of the same. I would appreciate your returning one (1) filed copy to me in the enclosed self-addressed stamped envelope. By copy of this letter I am serving a copy of the motion on all counsel of record.

With kindest regards, I am

Very truly yours,

MOSS, KUHN & FLEMING, P.A.


H. Fred Kuhn, Jr.

HFKjr:sr
Enclosures

cc: Andrew K. Epting, Jr., Esquire
Jaan G. Rannik, Esquire

✓



MOSS, KUHN & FLEMING, P.A.

ATTORNEYS AT LAW

1501 North Street

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HM

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