

89613

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

**RECEIVED**  
APR 22 2019  
SC Court of Appeals

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

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

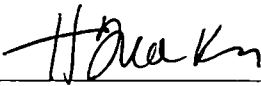
The Appellant-Respondents would respectfully request an extension of time within which  
to file the Record on Appeal. The Record on Appeal is due to be filed no later than April 15,

2019. The Appellant-Respondent would respectfully request a fifteen (15) 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 April 30, 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  
April 15, 2019

Attorneys for Appellants

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM THE BEAUFORT COUNTY  
COURT OF COMMON PLEAS

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CERTIFICATE OF SERVICE

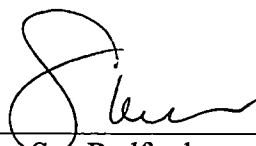
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Undersigned certifies that the **Notion of Motion and Motion for Extension of Time to File the Record on Appeal**, to which this certificate is affixed, was served upon the party (s) to

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 April 15, 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

April 15, 2019

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

RECEIVED  
APR 22 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,

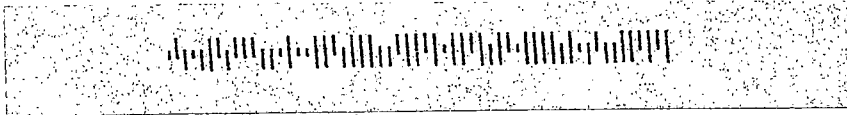
MOSS, KUHN & FLEMING, P.A.



H. Fred Kuhn, Jr.

HFkjrsr  
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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(843) 524-3373

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To:

**APR 22 2019**

**SC Court of Appeals**

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Clerk, South Carolina Court of Appeals  
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