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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APR 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.

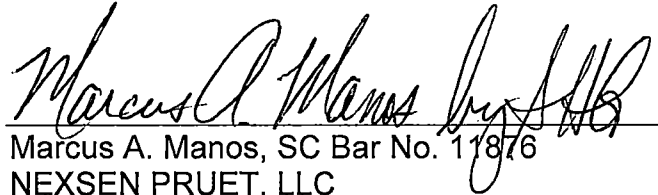
Michael Cousins; Founders Five, LLC d/b/a Sperry Van Ness Founders Group;
and South Carolina Association of REALTORS®..... Appellants.

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

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 response to
Respondents' Initial Brief in Response to Initial Brief of Appellant SCAR in the above-
captioned case. The Reply Brief of Appellant SCAR is due on April 26, 2019. Appellant's
counsel just received a copy of Respondents' Initial Brief in Response on April 24, 2019,
(see **attached** Letter with date stamp of receipt), counsel for SCAR is currently out of
town on business, and, therefore, he will be unable to devote the necessary time to
complete the Reply Brief, and respectfully requests the Court grant Appellant SCAR until

May 11, 2019 (which is a Saturday) to file Appellant SCAR's Reply Brief on Monday, May 13, 2019.

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

A handwritten signature in black ink, appearing to read "Marcus A. Manos by S.H.B.", written over a horizontal line.

Marcus A. Manos, SC Bar No. 11876
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Columbia, South Carolina 29202
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Attorneys for Appellant
South Carolina Association of REALTORS

April 25, 2019

Columbia, South Carolina

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+ CERTIFIED MEDIATOR
** CERTIFIED ARBITRATOR



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April 16, 2019

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, *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 herewith please find the originals and one copy of each of the Respondents' Initial Brief in Response to Initial Brief of Appellant South Carolina Association of Realtors, Designation of Matter to Be Included in the Record on Appeal, Certificate of Counsel, and Proof of Service in the above-referenced matter. Please file the original documents and return the clocked copies to me in the self-addressed stamped envelope enclosed for your convenience.

If you have any questions or need additional information, please feel to contact me.

With kindest regards, I am

Yours very truly,

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

Douglas M. Zayicek

RECEIVED

APR 24 2019

NEXSEN PRUET, LLC

Enclosures as noted

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

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SC Court of Appeals

Appeal from Horry County
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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.

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 In Response To Respondents' Initial Brief In Response To Initial Brief Of Appellant South Carolina Association Of REALTORS®** 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 25th day of April, 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

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

April 25, 2019

VIA HAND DELIVERY

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

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SC Court of Appeals

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:

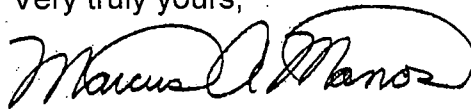
Enclosed for filing are an original and seven (7) copies of **Appellant South Carolina Association of REALTORS®' Motion To Extend Time To File Reply Brief In Response To Respondents' Initial Brief In Response To Appellant SCAR's Initial Brief and Proof of Service** in the above-referenced matter. I am 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