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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY COURT OF COMMON PLEAS

Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No. 2019-000413

Karl & Terri Hager, Robert Singleton & Teresa Singleton,
Jay & Susan Welborn, Erik Arnold, and Bowers Caravelle
LLC, derivatively and on behalf of Caravelle Resort
Association, Inc. and on behalf of themselves and those
similarly situated..... Appellants

RECEIVED

MAY 23 2019

SC Court of Appeals

v.

McCabe, Trotter & Beverly, PC and Gold Crown
Management Company, Inc.,

Of Which McCabe, Trotter & Beverly, PC is the..... Respondent.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Respondent requests a 45-day extension to file its initial brief and designation of matter to be included in the record on appeal. The current deadline is May 28, 2019, and Respondent requests a new deadline of July 12, 2019.

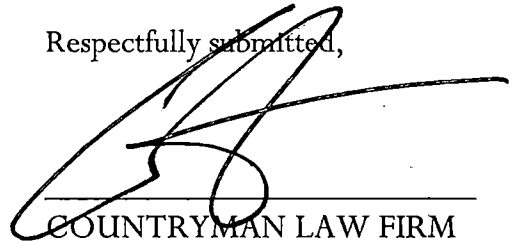
Despite multiple requests to the court reporter and Appellants' counsel, the undersigned did not receive the transcripts of the subject hearings until on or about May 14, 2019. Further, while Appellants' Initial Brief contains a service date of April 26, 2019, the undersigned did not receive it until May 2, 2019. Counsel needs additional time to prepare Respondents' Initial Brief and Designation of Matter. This is the first request for an extension.

Therefore, Respondent requests an extension to file its initial brief and designation of matter until July 12, 2019. The Respondents thank the Court in advance for its consideration.

May 21, 2019

ROGERS, TOWNSEND & THOMAS, P.C.
Robert P. Wood
1221 Main St., 14th Floor
P.O. Box 100200
Columbia, SC 29202-3200
Lawyer for Respondent

Respectfully submitted,



COUNTRYMAN LAW FIRM
Andrew W. Countryman
State Bar No.: 72700
321 Wingo Way, Ste. 102
Mt. Pleasant, SC 29464
Lawyer for Respondent

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Management

Of Which McCabe, Trotter & Beverly, PC is
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PROOF OF SERVICE

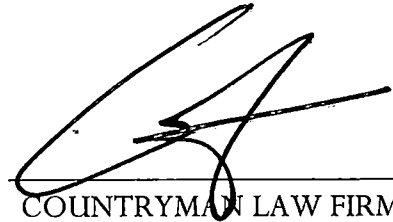
I certify that I have served Respondent's Motion for Extension on counsel for all parties in this case by depositing a copy in the United States Mail, postage prepaid addressed as follows:

Brian C. Gambrell
810 Dutch Square Blvd., Ste. 112
Columbia, SC 29210
Counsel for Appellants

Dominic A. Starr
McAngus Goudelock & Courie, LLC
P.O. Box 1349
Myrtle Beach, SC 29578
**Counsel for Gold Crown Management
Company, Inc.**

[signature page to follow]

May 21, 2019



COUNTRYMAN LAW FIRM

Andrew W. Countryman

321 Wingo Way, Ste. 102

Mt. Pleasant, SC 29464

Lawyer for Respondent

COUNTRYMAN LAW FIRM

Andrew W. Countryman Litigation ♦ Mediation
321 Wingo Way, Suite 102
Mount Pleasant, South Carolina 29464
*Certified S.C. Circuit Court Mediator

awc@countrymanlawfirm.com
www.countrymanlawfirm.com
843-253-4477 office
844-644-3165 fax

May 21, 2019

South Carolina Court of Appeals
Jenny Abbott Kitchings, Clerk
P.O. Box 11629
Columbia, SC 29211

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MAY 23 2019

SC Court of Appeals

Re: *Hager v. McCabe, Trotter & Beverly, P.C.*
 Appellate Case No. 2019-000413
CLF File: 000006 – 000051

Dear Jenny:

I represent the Respondent, McCabe, Trotter & Beverly, P.C. ("MTB") in this case. I enclose the following:

- (a) Original and seven copies of Respondent's Motion for Extension (with Proof of Service);
- (b) \$50 check for the filing fee; and
- (c) Return envelope.

Please file the original and return a filed copy in the envelope. By copy of this letter, I serve the lawyers for the other parties to this case with the Motion. Thanks for your assistance, and don't hesitate to let me know if you have questions or need to discuss.

My very best,



Andrew W. Countryman

AWC/sgc
Enclosures
Cc: Brian Gambrell, Dominic Starr

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Countryman Law Firm
321 Wingo Way, Suite 102
Mount Pleasant SC 29464-2989

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