

RECEIVED

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

MAY 31 2019

SC Court of Appeals

APPEAL FROM HORRY COUNTY
Horry County Circuit Court
Benjamin H. Culbertson, Circuit Court Judge

Appellate No. 2019-000413

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

v.

McCabe Trotter & Beverly, PC and Gold Crown Management.....Defendants

of whom

McCabe Trotter & Beverly, PC is.....Respondents

AFFIDAVIT OF HEATHER RAINY GREEN

PERSONALLY appeared before me Heather Rainy Green, who being duly sworn, deposes, and states:

1. My name is Heather Rainy Green. I am of the age of majority and am familiar with and fully competent to testify to the facts set forth in this Affidavit. I have personal knowledge of the facts herein.

2. I am employed as an office assistant at the Law Offices of Jason E. Taylor, P.C. in Columbia, South Carolina.

3. On April 26, 2019, I was directed by an attorney of the office, Brian Gambrell, to file the initial brief and designation of matter on appeal with the Clerk of Court and to mail copies of the same to all counsel of record.

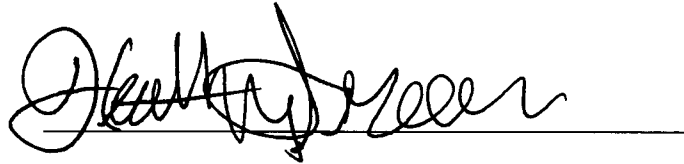
4. Mr. Gambrell made the copies and placed the documents in the envelope with the original on top. I weighed the packages and placed the posted on the envelopes.

5. As instructed, I took the original copy on at approximately 4:30 pm on April 26, 2019 to the Clerk of the Court of Appeal and filed the original. I did not obtain a stamped copy.

6. I also dropped off the copies to opposing counsel at the Dutch Fork Post Office.

7. Mr. Countryman has filed a motion for extension attached hereto which acknowledges receipt of the initial brief and record on appeal on May 2, 2019.

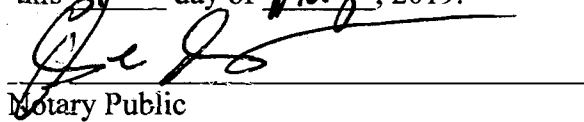
FURTHER AFFIANT SAITH NOT!



Heather Rainy Green

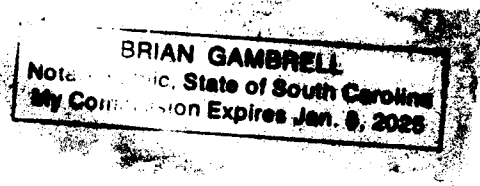
Sworn to and subscribed before me

this 21st day of May, 2019.



Notary Public

My Commission Expires: _____



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SC Court of Appeals

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,

v.

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

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

MOTION FOR EXTENSION

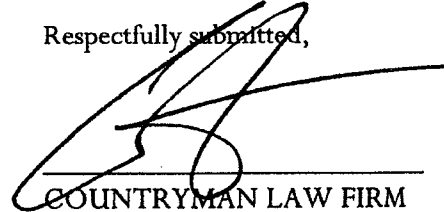
Pursuant to Rule 240, SCACR, Respondent requests a 45-day extension to file its initial brief and designation of matter to be included in the record on appeal. The current deadline is May 28, 2019, and Respondent requests a new deadline of July 12, 2019.

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

Respectfully submitted,



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

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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SC Court of Appeals

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 on behalf of Caravelle Resort
Association, Inc. and on behalf of themselves and those
similarly situated..... Appellants,

v.

McCabe, Trotter & Beverly, PC and Gold Crown
Management

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

PROOF OF SERVICE

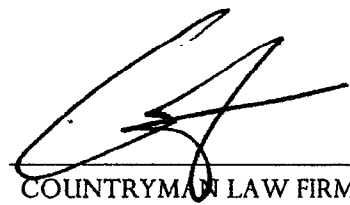
I certify that I have served Respondent's Motion for Extension on counsel for all parties in
this case by depositing a copy in the United States Mail, postage prepaid addressed as follows:

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

A handwritten signature in black ink, appearing to be 'A. Countryman', written over a horizontal line.

COUNTRYMAN LAW FIRM
Andrew W. Countryman
321 Wingo Way, Ste. 102
Mt. Pleasant, SC 29464
Lawyer for Respondent

COUNTRYMAN LAW FIRM

Litigation ♦ Mediation

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

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May 21, 2019

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MAY 31 2019

SC Court of Appeals

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

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