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**STATE OF SOUTH CAROLINA
In the Court of Appeals**

**Appeal from Greenville County
The Honorable C. Simmons, Master in Equity**

Raymond A. Wedlake, individually and
derivatively, on behalf of all Members of the
Woodington Homeowners' Association, Inc.,

Appellant,

v.

Benjamin Acord, William Craigo, Denis Esteve,
and Brian James in their capacity as the current
Board of Directors of the
Woodington Homeowners' Association, Inc.

Respondents

Appellate Case No. 2018-001209
Civil Action # 2017-CP-23-06301

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AUG 09 2019
SC Court of Appeals

**MOTION FOR TEN-DAY EXTENSION OF TIME TO FILE RESPONSE TO
DEFENDANT'S MOTION TO DISMISS
ON COUNSEL FOR RESPONDENT
PURSUANT TO RULE 210**

Appellant, Raymond A. Wedlake, individually and derivatively, on behalf of all Members of the Woodington Homeowners' Association, Inc., by and through its counsel, respectfully moves this Court for a ten (10) day extension of time in which to file the its Response to Defendant's Motion to Dismiss which was received by mail on August 7, 2019.

The undersigned counsel for Appellant, Grant H. Gibson, Esq. would respectfully show the Court:

Counsel for Appellant requests such extension on the following grounds:

Counsel for Appellant needs such additional time to properly prepare the Reply to Defendant's Motion to Dismiss, in accordance with the South Carolina Rules of Appellate Procedure.

Counsel for Appellant is required during this period to travel for work purposes.

Counsel for Appellant, Grant Gibson, Esq., in addition, will be unavailable for several days since his twin sons will each be moving into dorms at two separate colleges on August 14 and August 15, respectfully.

Counsel for Appellant has conferred with Counsel for Respondent, Ely Grote, Esq., who is being served a copy of this Motion, of his need for this first extension and Ely Grote, Esq. has stated that he has no objections thereto.

THEREFORE, based upon the foregoing, the undersigned counsel for Appellant respectfully petitions this Court for a first extension of ten (10) days to respond to counsel for Respondent's Motion to Dismiss.

Proof of Service on Ely Grote, Esq. accompanies this Motion.

Respectfully submitted,

GRANT H. GIBSON, ESQ.
Counsel for Appellant + Raymond Wedlake



Grant H. Gibson, Esq. Bar #: 0009269
661 W. Johns Creek Pkwy.
St. Augustine, Fl. 32092
Tel: (864) 630-7471
atty@ggibsonassociates.com

August 8, 2019

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Greenville County
The Honorable C. Simmons, Master in Equity

Raymond A. Wedlake, individually and
derivatively, on behalf of all Members of the
Woodington Homeowners' Association, Inc.,

v.

Benjamin Acord, William Craigo, Denis Esteve,
and Brian James in their capacity as the current
Board of Directors of the
Woodington Homeowners' Association, Inc.

Appellant,

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Appellate Case No. 2018-001209

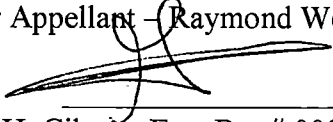
Civil Action # 2017-CP-23-06301

CERTIFICATE OF SERVICE

It is hereby certified that a copy of **“MOTION FOR TEN-DAY EXTENSION OF TIME TO FILE RESPONSE TO DEFENDANT’S MOTION TO DISMISS ON COUNSEL FOR RESPONDENT PURSUANT TO RULE 210”** was served upon the following via the United States Post Office, Priority Mail on August 08, 2019, Tracking Number: 9505 5265 1566 9220 9936 12.:

Ely O. Grote, SC Bar No. 75379 McCabe, et. al.
4500 Fort Jackson Blvd., Suite 250 (29209)
P.O. Box 212069, Columbia, SC 29221

Respectfully Submitted,
GRANT H. GIBSON, ESQ.
Counsel for Appellant – Raymond Wedlake


Grant H. Gibson, Esq. Bar #:0009269
661 W. Johns Creek Pkwy. St. Augustine, Fl. 32092
Tel: (864) 630-7471 atty@ggibsonassociates.com

G. Gibson & Associates, LLC
GRANT H. GIBSON, ESQ.

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SC Court of Appeals

Grant H. Gibson, Esq.
1600 W. Johns Creek Pkwy.
St. Augustine, Fl. 32092
Cell: 864-630-7471
Fax: 866-667-2509
atty@ggibsonassociates.com

August 8, 2019

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
PO Box 11629 (29211)
1220 Senate Street
Columbia, South Carolina 29201

**Re: Motion for First Extension to Respond to Respondent's Motion to Dismiss
and Proof of Service – Raymond A. Wedlake v. Benjamin Acord
Appellate Case No: 2018-001209 – Payment of Filing Fee**

Dear Ms. Kitchings:

Enclosed please find our Motion requesting a First Extension to Respond to Respondent's Motion to Dismiss and Proof of Service of such Motion on counsel for Respondent, Ely Grote, Esq., along with our check for the filing fee of \$50.

Thank you very much and should you have any questions please do not hesitate to call me at: 864-630-7471.

Respectfully,



Grant H. Gibson, Esq.

Enclosures – Motion & Ck # 1226
cc. Ely Grote, Esq. (via U.S. Mail, w/enclosures)

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FROM:



Wedlake
703 Creekview Dr.
Greenville, SC 29607-6007

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AUG 09 2019

SC Court of Appeals

TO:

*The Honorable Seung Abbott Kitchens
Clerk of Court, SC Court of Appeals
PO Box 11629
Columbia, SC 29211*

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