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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

AUG 16 2019

Craig D. Brown, Circuit Court Judge

S.C. SUPREME COURT

Case No. 2017-CP-10-05246
Appellate Case No. 2019-001360

WHEELOCK STREET REAL
ESTATE FUND, LP AND
WHEELOCK STREET
CAPITAL, LLC,

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AUG 16 2019

SC Court of Appeals

Appellants,

v.

GARY KEISLER,
INDIVIDUALLY AND AS
CLASS REPRESENTATIVE,
JOHN DOES (1-50) AND
JANE DOES (1-50).

Respondents.

**CONSENT MOTION FOR EXTENSION OF TIME AS TO APPELLANTS' INITIAL
BRIEF**

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Attorneys for Appellants

CONSENT MOTION FOR EXTENSION OF TIME AS TO APPELLANTS' INITIAL BRIEF

Pursuant to the South Carolina Appellate Court Rules, Appellants, Wheelock Street Real Estate Fund, LP and Wheelock Street Capital, LLC, by and through counsel, respectfully move for an Order extending the time for Appellants to serve and file their Initial Brief that is due on August 20, 2019. Appellants seek to extend the deadline by twenty-one (21) days, to September 10, 2019. Respondent consents to this extension.

Appellants are preparing their Initial Brief and seek an extension of time to ensure that their brief is adequately researched and prepared. There are numerous issues of law and fact which Appellants must address, and Appellants do not seek this extension for undue delay or any improper purpose. If granted, this would be the first extension of time granted to Appellants.

For all of these reasons, Appellants respectfully ask the Court to grant them until September 10, 2019 to serve and file their Initial Brief.

DUFFY & YOUNG, LLC

By:  _____

Brian C. Duffy
Stephen J. Bell
96 Broad Street
Charleston, SC 29401
(843) 720-2044

August 15, 2019
Charleston, South Carolina

Attorneys for Appellants

THE STATE OF SOUTH CAROLINA
In The SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

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Appellants,

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JOHN DOES (1-50) AND
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CERTIFICATE OF SERVICE

I, Janice V. Prosen, Paralegal at Duffy & Young, LLC, certify that I have served the **CONSENT MOTION FOR EXTENSION OF TIME AS TO APPELLANTS' INITIAL BRIEF** on Respondents and all other parties on August 15, 2019 by U.S. First Class mail to their attorneys of record as shown below:

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and Neighborhood Management Associates,
Inc.*

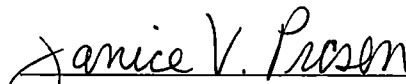
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ATTORNEYS AT LAW

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AUG 16 2019

S.C. SUPREME COURT

August 15, 2019

VIA FEDERAL EXPRESS

The Honorable Daniel E. Shearouse
South Carolina Supreme Court Clerk of Court
Supreme Court Building
1231 Gervais Street
Columbia, South Carolina 29201

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AUG 16 2019
SC Court of Appeals

RE: Wheelock Street Real Estate Fund, LP, et al. v. Gary Keisler, et al.
Appellate Case No. 2019-001360

Wheelock Street Real Estate Fund, LP, et al. v. One Hamlin Place
Appellate Case No. 2019-001245

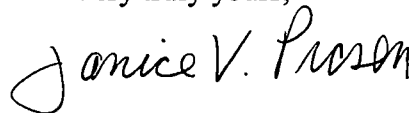
Dear Mr. Shearouse:

Enclosed for filing please find originals and seven (7) copies of each Consent Motion for Extension of Time as to Appellants' Initial Brief in connection with the above-referenced matters. Also enclosed is a check in the amount of \$100.00 for the filing fees, and originals and one copy of each Certificate of Service.

Please file the originals and return file-stamped copies of the Motions and Certificates of Service to our office in the enclosed self-addressed stamped envelope.

I appreciate your assistance in this matter. Should you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,



Janice V. Prosen
Paralegal

Enclosures

cc (w/Enclosures): All counsel of record

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SHIP DATE: 15AUG19
ACTWGHT: 1.00 LB
CAD: 78407480NET#150

CHARLESTON, SC 29401
UNITED STATES US

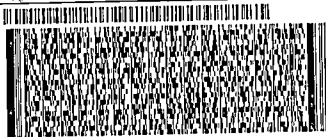
BILL SENDER

TO THE HONORABLE DANIEL E. SHEAROUSE
SC SUPREME COURT CLERK OF COURT
1231 GERVAIS STREET

507L08E7062

COLUMBIA SC 29201

(843) 270-2044 REF
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