

90827

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Judge Marvin H. Dukes III, Master-in-Equity

**RECEIVED**

SEP 11 2019

APPELLATE COURT CASE NO. 2019-000928  
COMMON PLEAS CASE NO. 2017-CP-07-00851

**SC Court of Appeals**

River City Developers, LLC ..... Appellant,

v.

The Marshes at Lady's Island Homeowners' Association, Bundy Appraisal & Management, First Green, LLC, Tige Howie & Stephen Scott ..... Respondents.

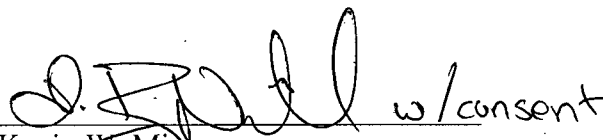
**CONSENT MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

Appellant River City Developers, LLC hereby respectfully submits this motion, with the consent of the Respondents, to request a thirty (30) day extension to file the Appellant's Initial Brief in this matter, as permitted by Rule 263, SCACR. Accordingly, Appellant hereby moves this Honorable Court for an Order granting Appellant's request and extending the deadline for Appellant's Initial Brief by thirty (30) days, which Appellant respectfully submits to be October 14, 2019.

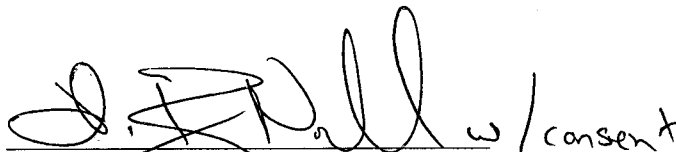
September 10, 2019

  
Irish "Ryan" Neville (SC Bar #76513)  
Stephen A. Spitz (SC Bar #5287)  
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Charleston, SC 29401  
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[sasp@stevenslee.com](mailto:sasp@stevenslee.com)  
ATTORNEYS FOR APPELLANT

WE CONSENT:

 w/consent  
Kevin W. Mims  
Whitbee Sale Perrin  
Luzuriaga Mims, LLP  
50 Immigration Street, Suite 200  
Charleston, SC 29403  
Phone: 843-410-4713

and

 w/consent  
Michael A. Timbes  
Thurmond Kirchner & Timbes  
15 Middle Atlantic Wharf  
Charleston, SC 29401

ATTORNEYS FOR RESPONDENTS

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Judge Marvin H. Dukes III, Master-in-Equity

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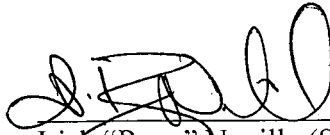
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**PROOF OF SERVICE**

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I certify that I have filed, via overnight delivery, Appellant's Consent Motion for Extension of Time to File Initial Brief on September 10, 2019, with the Clerk of Court for the South Carolina Court of Appeals, as well as the Office of Court Administration for the South Carolina Court of Appeals, and I have served the same upon Respondents, via overnight delivery, through their lawyers Kevin Mims, J. Barnwell Fishburne, Jr., and Whidbee S. Perrin with the law firm of Luzuriaga Mims, LLP at 50 Immigration Street, Suite 200, Charleston, SC 29403, as well as their co-counsel, Michael A. Timbes of Thurmond Kirchner & Timbes at 15 Middle Atlantic Wharf, Charleston, SC 29401.

September 10, 2019



Irish "Ryan" Neville (SC Bar #76513)

Stephen A. Spitz (SC Bar #5287)

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ATTORNEYS FOR APPELLANT

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September 10, 2019

**BY OVERNIGHT DELIVERY**

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

**RECEIVED**  
SEP 11 2019  
SC Court of Appeals

**Re: River City Developers, LLC v. The Marshes at Lady's Island Homeowners' Association, Bundy Appraisal & Management, First Green, LLC, Tige Howie & Stephen Scott**  
Appellate Court Case No.: 2019-000928  
Common Pleas Case No.: 2017-CP-07-00851  
Our File No.: 113518-00001

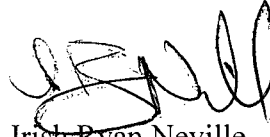
Dear Ms. Kitchings:

Enclosed for filing, please find an original and six (6) copies of the Appellant's Consent Motion for Extension of Time to File Initial Brief and Proof of Service. In addition, please find enclosed the \$50 filing fee.

If you have any questions, please do not hesitate to contact us.

Best regards,

STEVENS & LEE



Irish Ryan Neville

STEVENS & LEE  
LAWYERS & CONSULTANTS

Page 2

Enclosures

Cc: Kevin W. Mims  
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Michael A. Timbes  
Thurmond Kirchner & Timbes  
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Charleston, SC 29401

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CHARLESTON SC 29401

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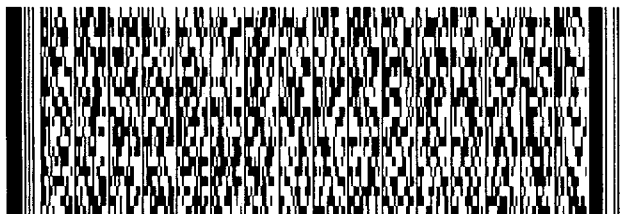
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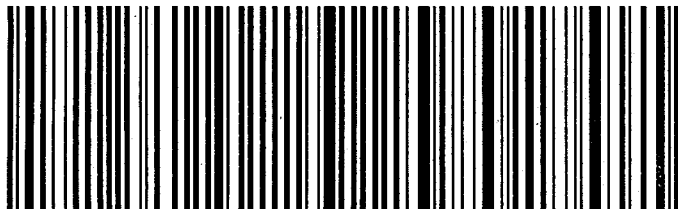
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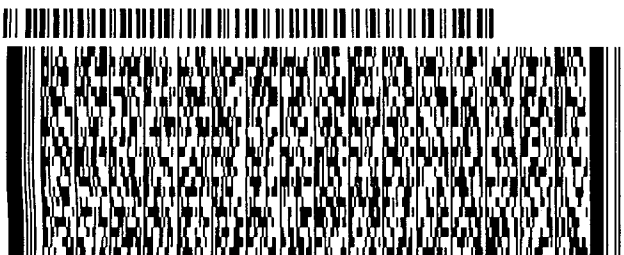
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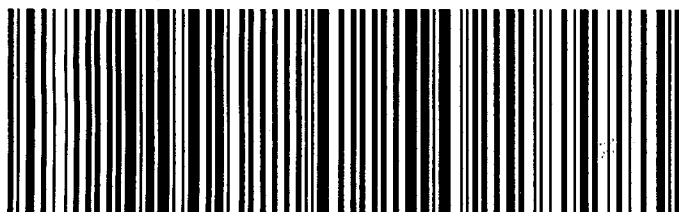
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