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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**  
SEP 05 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 TO FILE FINAL BRIEF**

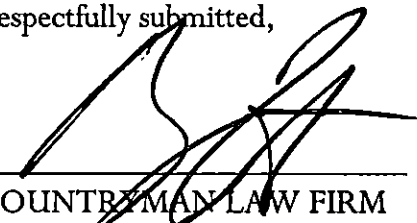
Pursuant to Rule 240, SCACR, Respondent McCabe, Trotter & Beverly, P.C. ("MTB") requests an extension to file its final brief. Appellants filed the Record on Appeal on August 20, 2019. However, the Record on Appeal contains an inadvertent error. MTB included the Answer to the Complaint and Answer to the Amended Complaint as material to be included in the Record on Appeal. See Designation of Matter to be Included in the Record on Appeal (filed Jul 22, 2019). However, the Record on Appeal includes the Answer to the Complaint twice instead of the Answer to the Complaint and Answer to the Amended Complaint.

MTB alerted counsel for Appellants to this via a letter dated August 21, 2019. *See* Letter filed with Court of App. (filed Aug. 26, 2019). To date, this error has not been corrected. MTB is unable to prepare its final brief without the correction because it cannot cite to the Answer to the Amended Complaint in its final brief. This correction would presumably be accomplished via an amended or supplemental Record on Appeal.

Therefore, MTB requests an extension to file its final brief 20 days after the service of a corrected or supplemental Record on Appeal to include MTB's Answer to the Amended Complaint. This is the first request for an extension. MTB thanks the Court in advance for its consideration.

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

Respectfully submitted,



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

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Appellate Case No. 2019-000413

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Jay & Susan Welborn; Erik Arnold; and Bowers Caravelle  
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**RECEIVED**

v.

SEP 05 2019  
SC Court of Appeals

McCabe, Trotter & Beverly, PC and Gold Crown  
Management

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

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**PROOF OF SERVICE**

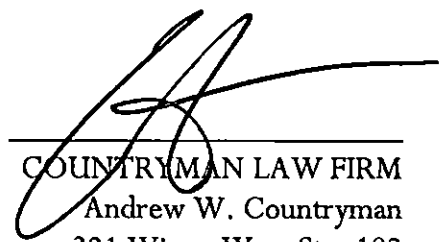
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I certify that I have served Respondent's Motion for Extension to File Final Brief on counsel  
for all parties in this case by via Federal Express addressed as follows:

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

Dominic A. Starr  
McAngus Goudelock & Courie, LLC  
2411 North Oak St.  
Myrtle Beach, SC 29577-3173  
**Counsel for Gold Crown Management  
Company, Inc.**

This 3<sup>rd</sup> day of Sept., 2019



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

# COUNTRYMAN LAW FIRM

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Mount Pleasant, South Carolina 29464  
\*Certified S.C. Circuit Court Mediator

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844-644-3165 fax

September 3, 2019

**Via FedEx**

South Carolina Court of Appeals  
Jenny Abbott Kitchings, Clerk  
1220 Senate St.  
Columbia, SC 29201

**RECEIVED**  
SEP 05 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 to File Final Brief (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 (via FedEx): Brian Gambrell, Dominic Starr

# FedEx

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SEP 05 2019  
SC Court of Appeals

COLUMBIA SC 29201 (US)  
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