

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

The Honorable Marvin H. Dukes, III  
Beaufort County  
Trial Case No. 2011-CP-07-1933

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COURT OF APPEALS  
Case No. 2017-000487  
Appellate Case No. 2019-001740

Deep Keel, LLC,

Respondent,

v.

Atlantic Private Equity Group, LLC, Terry L. Rohlfig  
Jerry T. Caldwell, and Bluffton Village Town Center  
Property Owners' Association, Inc.,

Defendants,

Of Whom Atlantic Private Equity Group, LLC,  
Terry L. Rohlfig, and Jerry Caldwell are the

Petitioners.

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**MOTION FOR EXTENSION OF TIME TO FILE RETURN  
TO PETITION FOR WRIT OF CERTIORARI**

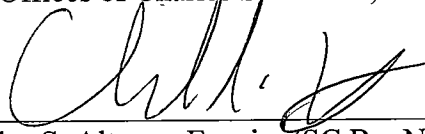
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Counsel for Deep Keel, LLC (hereinafter "Respondent") respectfully moves this court to extend the time for filing Respondent's return to Petitioners Petition for Writ of Certiorari based on the following circumstances:

1. The Petition was received by Respondent's Counsel on or about October 18, 2019 and the return to the Petition would be due on November 17, 2019.
2. As a result of other matters with time deadlines and Counsel's current workload, it would cause a hardship to Respondent to meet the November 17<sup>th</sup> deadline.

Based on the circumstances above, Respondent respectively moves for an Extension to file its return to Petitioner's Petition for Writ of Certiorari to December 17, 2019.

Respectively Submitted,  
Law Offices of Charles S. Altman, LLC



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Charles S. Altman, Esquire (SC Bar No. 351)  
Matthew A. Williamson, Esquire (SC Bar No. 10391)  
575 King Street, Suite A  
Charleston, SC 29403  
(843) 853-9907  
Attorneys for the Respondent, Deep Keel, LLC

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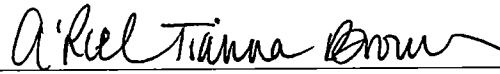
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**CERTIFICATE OF SERVICE**

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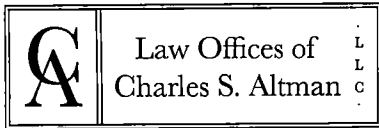
I certify that I have served the Extension for Writ of Certiorari on Defendants, Atlantic Private Equity Group, LLC, Terry L. Rohlfig Jerry T. Caldwell, and Bluffton Village Town Center Property Owners' Association, Inc., by depositing a copy of it in the United States Mail, postage prepaid on October 24, 2019, addressed to their attorney of record:

Keating L. Simons, III, Bar No. 5111  
SIMONS & DEAN  
147 Wappoo Creek Drive, Suite 604  
Charleston, SC 29412  
(843) 762-9132  
Attorneys for Petitioners



A'Riel Brown, Paralegal  
Law Offices of Charles S. Altman, LLC  
575 King Street, Suite A  
Charleston, SC 29403  
(843) 853-9907  
Attorneys for the Respondent

October 24, 2019  
Charleston, SC 29403



October 24, 2019

**VIA UPS OVERNIGHT MAIL:**

Daniel E. Shearouse  
Honorable Clerk of Court  
The Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, South Carolina 29211

**RE: Deep Keel, LLC v. Atlantic Private Equity Group, LLC  
Appellate Case No.: 2019-001740**

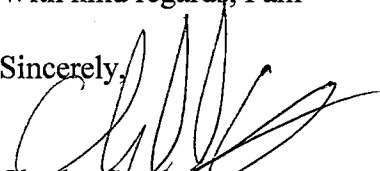
Dear Mr. Shearouse:

Enclosed please find Respondent's **Motion for Extension of Time to File Return to Petition for Writ of Certiorari**. I have contacted Keating L. Simons, III, Esquire, Attorney for the Petitioners regarding the requested extension of time and he has indicated that he consents to the same. Please present our Motion for approval. I'm also enclosing the original of our Certificate of Mailing of a copy of our Motion sent to Mr. Simons.

Our check in the amount of Fifty Dollars (\$50.00) is also enclosed for the filing fee for the Motion.

But also know at this point that while Meredith L. Coker, Esquire, and Patrick John Norton, Esquire were members of our firm and were on the initial pleadings in this matter, but they are no longer with the firm and will not be participating in the matter before the Supreme Court.

With kind regards, I am

Sincerely,  
  
Charles S. Altman

CSA/atb

Enclosures

Cc: Keating Simons, III, Esquire  
Meredith L. Coker, Esquire  
Patrick J. Norton, Esquire

**RECEIVED**  
OCT 24 2019  
S.C. SUPREME COURT