

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
In the Court of Common Pleas for the Fourteenth Circuit

J. Ernest Kinard, Jr., Circuit Court Judge

Appellate Case No. 2015-00001  
Unpublished Case No. 2019-UP-393

RECEIVED

DEC 19 2019

SC Court of Appeals

The Callawassie Island Members Club, Inc. .... Respondent,

v.

Gregory L. Martin and Rebecca L. Martin ..... Defendants,

and

The Callawassie Island Members Club, Inc. .... Respondent,

v.

Michael J. Frey and Grace I. Frey ..... Defendants,

and

The Callawassie Island Members Club, Inc. .... Respondent,

v.

Mark K. Quinn and Sherry B. Quinn ..... Defendants,

Of whom Gregory L. Martin, Michael J. Frey, and Mark K. Quinn are the Appellants.

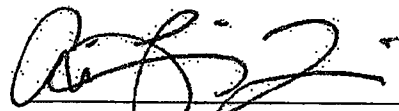
MOTION FOR AN EXTENSION OF TIME  
IN WHICH TO FILE PETITION FOR REHEARING

On December 18, 2019, this Court consolidated the above cases and filed its Unpublished Opinion No. 2019-UP-393. Pursuant to Rule 221 of the South Carolina Appellate Court Rules, a Petition for Rehearing of the Court's opinion is currently due on January 2, 2020.

The Appellants respectfully request that they would be given an extension until January 31, 2020 in which to file their Petition for Rehearing. The grounds for this motion include the time constraints presented by the upcoming holiday season, as well as counsel's involvement in several appeals, all with deadlines in January. Counsel for Appellants has consulted with counsel for the Respondents as to their consent to this extension; however, as of this writing, they have not yet received a definitive reply.

Respectfully submitted,

FORD WALLACE THOMSON LLC



Ian S. Ford

Neil D. Thomson

Ainsley F. Tillman

715 King St., Charleston, South Carolina 29403

(843) 277-2011

*Attorneys for Respondents Gregory L. Martin,*

*Michael J. Frey, and Mark K. Quinn*

December <sup>19<sup>th</sup></sup> 2019  
Charleston, South Carolina

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM BEAUFORT COUNTY  
In the Court of Common Pleas for the Fourteenth Circuit

J. Ernest Kinard, Jr., Circuit Court Judge

---

Appellate Case No. 2015-00001  
Unpublished Case No. 2019-UP-393

---

The Callawassie Island Members Club, Inc. .... Respondent,

v.

Gregory L. Martin and Rebecca L. Martin ..... Defendants,

and

The Callawassie Island Members Club, Inc. .... Respondent,

v.

Michael J. Frey and Grace I. Frey ..... Defendants,

and

The Callawassie Island Members Club, Inc. .... Respondent,

v.

Mark K. Quinn and Sherry B. Quinn ..... Defendants,

Of whom Gregory L. Martin, Michael J. Frey, and Mark K. Quinn are the Appellants.

---

**PROOF OF SERVICE**

---

I hereby certify that I served the within *Motion for Extension of Time in which to File Petition for Rehearing* on all counsel of record by depositing a copy of it in the United States Mail, postage prepaid, on December 19, 2019, addressed to their attorneys of record:

Stephen P. Hughes, Esq.  
Howell, Gibson and Hughes  
P.O. Box 40  
Beaufort, SC 29901;

M. Dawes Cooke, Jr., Esq.  
John Fletcher, Esq.  
Barnwell Whaley Patterson & Helms, LLC  
P.O. Drawer H  
Charleston, SC 29402;

Andrew F. Lindemann, Esq.  
Davidson & Lindemann, P.A.  
P.O. Box 8568  
Columbia, SC 29202.

**[Signature Block Appears on Next Page]**

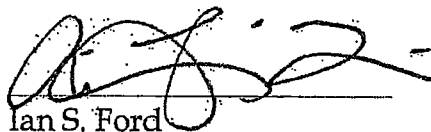
RECEIVED

DEC 19 2019

SC Court of Appeals

Respectfully submitted,

FORD WALLACE THOMSON LLC



Ian S. Ford

Neil D. Thomson

Ainsley F. Tillman

715 King St., Charleston, South Carolina 29403

(843) 277-2011

*Attorneys for Respondents Gregory L. Martin,  
Michael J. Frey, and Mark K. Quinn*

December 19<sup>th</sup>, 2019  
Charleston, South Carolina

FORD WALLACE THOMSON LLC  
OPERATING ACCOUNT  
715 KING ST.  
CHARLESTON, SC 29403  
843-277-2011

FIRST CITIZENS BANK

3355

67-604,333  
277  
CHECK AMOUNT

12/19/2019

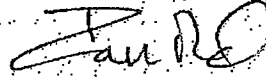
PAY TO THE ORDER OF SC Court of Appeals

\$ \*\*50.00

Fifty and 00/100

DOLLARS

SC Court of Appeals



MEMO

Motion for Extension

AUTHORIZED SIGNATURE



FORD WALLACE THOMSON LLC

OPERATING ACCOUNT

3355

12/19/2019

SC Court of Appeals

Motion for extension

50.00

FC Operating 6349

Motion for Extension

50.00

FORD WALLACE THOMSON LLC

OPERATING ACCOUNT

3355

12/19/2019

SC Court of Appeals

Motion for extension

50.00

FC Operating 6349

Motion for Extension

50.00

Photo Safe Deposit  
Details on Back

# FAX

<b>Date:</b>	12/19/2019
--------------	------------

<b>Pages including cover sheet:</b>	7
-------------------------------------	---

<b>To:</b>	
<b>Phone</b>	
<b>Fax Phone</b>	(803) 734-1839

<b>From:</b>	Ian Ford
	Ford & Wallace LLC
	715 King Street
	Charleston
	SC 29403
<b>Phone</b>	18432772011
<b>Fax Phone</b>	18434105634

**NOTE:**

Attached for filing in this matter, please find Respondent's Motion for Extension of Time in which to File Petition for Rehearing, and Proof of Service.

The same will follow via U.S. Mail.

Ainsley Fisher Tillman  
 Ford Wallace Thomson LLC  
 715 King Street  
 Charleston, S.C. 29403

T. 843.266.1289  
 E. Ainsley.Tillman@FordWallace.com  
 W. www.FordWallace.com

**RECEIVED**  
 DEC 19 2019  
 SC Court of Appeals