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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Unpublished Case No. 2019-UP-393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 23 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.

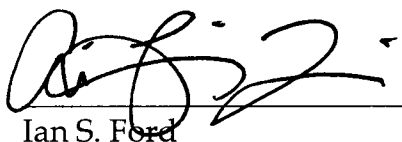
**MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE PETITION FOR REHEARING**

On December 18, 2019, this Court consolidated the above cases and filed its Unpublished Opinion No. 2019-UP-393.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 19th, 2019
Charleston, South Carolina

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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;

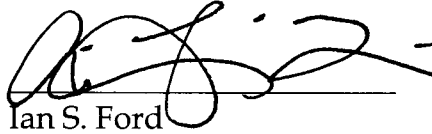
M. Dawes Cooke, Jr., Esq.
John Fletcher, Esq.
Barnwell Whaley Patterson & Helms, LLC
P.O. Drawer H
Charleston, SC 29402;

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

[Signature Block Appears on Next Page]

Respectfully submitted,

FORD WALLACE THOMSON LLC

A handwritten signature in black ink, appearing to read 'Ian S. Ford', written over a horizontal line.

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 19th, 2019
Charleston, South Carolina

FORD WALLACE THOMSON LLC

ATTORNEYS AT LAW

December 19, 2019

VIA US MAIL:

Jenny Abbot Kitchings, Clerk
SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *The Callawassie Island Members Club Inc. vs. Michael J. Frey*
SC Court of Appeals Case No.: 2015-00001
Beaufort County Case No: 2012-CP-07-03209
Ford Wallace Thomson File No.: 00596

The Callawassie Island Members Club Inc. vs. Gregory L. Martin
SC Court of Appeals Case No.: 2015-00001
Beaufort County Case No: 2012-CP-07-03209
Ford Wallace Thomson File No.: 00589

The Callawassie Island Members Club Inc. vs. Mark K. Quinn
SC Court of Appeals Case No.: 2015-00001
Beaufort County Case No: 2012-CP-07-03209
Ford Wallace Thomson File No.: 00602

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SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing please find the original and six copies of a Motion for an Extension of time in which to file Petition for Rehearing and Proof of Service in the above-referenced matters, as well as a filing fee.

By copy of this letter, I am serving all counsel of record with the same.

Thank you in advance for your assistance with this matter. Should you have any questions or concerns, please do not hesitate to contact my office.

With kind regards, I am,

Very truly yours,



Ainsley F. Fillman

AFT/ja

Enc. - as stated

cc: Stephen Hughes, Esq.
Andrew Lindemann, Esq.
M. Dawes Cooke, Jr., Esq.

Ford Wallace Thomsen
715 King Street
Charleston, SC 29403

Jenny Abbot Kitchings, Clerk
SC Court of Appeals
1220 Senate Street
Columbia, SC 29201



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