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**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM HORRY COUNTY
COURT OF COMMON PLEAS
THE HONORABLE BENJAMIN H. CULBERTSON
CIRCUIT COURT JUDGE

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JAN 16 2020

SC Court of Appeals

APPELLATE CASE NO. 2019-000964
CIVIL ACTION NO. 2016-CP-26-06495

Cornell Patton, Melissa Patton, Chad Webb and Amy Webb,

APPELLANTS,

versus

Prestwick Land Limited Partnership; Prestwick Homeowners Association, Inc.; Jackson Companies; City of Myrtle Beach; South Carolina Department of Transportation; Horry County; Myrtle Beach Air Force Base Redevelopment Authority; Nelson L. Hardwick & Associates, Inc.; Bermuda Gardens Homeowners' Association d/b/a Homeowners of Ocean Walk Property Owners Association; Campgrounds, Inc.; and Prestwick Property Owners Associations, Inc.,

DEFENDANTS,

Of Which Prestwick Land Limited Partnership, Jackson Companies, and Campgrounds, Inc. are the

RESPONDENTS.

City of Myrtle Beach,

THIRD-PARTY PLAINTIFF,

versus

Phil Eaves and Elizabeth Eaves,

**THIRD-PARTY DEFENDANTS,
COUNTERCLAIMANTS/CROSS
CLAIMANTS, APPELLANTS.**

MOTION FOR EXTENSION OF TIME

The Initial Brief of Respondents, Prestwick Land Limited Partnership, Jackson Companies, and Campgrounds, Inc., and Designation of Matter to be Included in the Record on Appeal were originally due on December 16, 2019. At the Respondents' request, the Court granted a 30-day extension of time, until January 15, 2020, to serve and file the Respondents' Initial Brief and Designation of Matter. The Respondents, Prestwick Land Limited Partnership, Jackson Companies, and Campgrounds, Inc., respectfully requests the Court to grant a second extension of 30 days, or until Friday, February 14, 2020, to serve and file its Initial Brief of Respondents and Designation of Matter.

Counsel for the Respondents requests a second extension due to her current workload and holiday vacation.

Counsel for the Respondents has contacted the Appellants' counsel and he consents to this request as indicated in the attached document.

Accordingly, the Respondents, Prestwick Land Limited Partnership, Jackson Companies, and Campgrounds, Inc., respectfully request an additional 30-day extension of time in which to serve and file their Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal.



Carmen V. Ganjehsani
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Douglas C. Baxter
RICHARDSON, PLOWDEN & ROBINSON, PA
Post Office Drawer 3646
Myrtle Beach, South Carolina 29578
(843) 448-1008
**ATTORNEYS FOR RESPONDENTS
PRESTWICK LAND LIMITED
PARTNERSHIP, JACKSON
COMPANIES, AND CAMPGROUNDS,
INC.**

January 15, 2020.

EXHIBIT “A”

Carmen Ganjehsani

From: Gene Connell <gconnell@classactlaw.net>
Sent: Wednesday, January 15, 2020 11:50 AM
To: Carmen Ganjehsani
Subject: RE: Patton v. Prestwick Land Limited Partership et al.

Ms. Ganjehsani,

I just spoke with Gene Connell and he is fine with this extension if the court is willing to grant it.

Barb Smith
Legal Assistant to Gene M. Connell, Jr.
(843) 238-5648
bsmith@classactlaw.net


ATTORNEY-CLIENT PRIVILEGED; DO NOT FORWARD WITHOUT PERMISSION

From: Carmen Ganjehsani <CGanjehsani@RichardsonPlowden.com>
Sent: Monday, January 13, 2020 1:59 PM
To: Gene Connell <gconnell@classactlaw.net>
Subject: Patton v. Prestwick Land Limited Partership et al.

Mr. Connell,

My Initial Respondent's Brief and Designation of Matter is currently due this Wednesday, January 15, 2020. I would like to request one final extension of 30 days to file the brief and I would appreciate your consent.

Thank you,
Carmen Ganjehsani

HOME	VCARD	LOCATION
	Carmen V. Ganjehsani Special Counsel Cganjehsani@RichardsonPlowden.com	
	Richardson Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 www.RichardsonPlowden.com	

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CERTIFICATE OF SERVICE

I, the undersigned, attorney Respondents, Prestwick Land Limited Partnership, Jackson Companies, and Campgrounds, Inc., do hereby certify that I have this date served the foregoing Motion for Extension of Time, dated January 15, 2020, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Gene M. Connell, Jr.
KELAHER, CONNELL & CONNOR, P
Post Office Drawer 14547
Surfside Beach, SC 29587-4547
Attorneys for Appellants

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**ATTORNEYS FOR RESPONDENT
PRESTWICK LAND LIMITED
PARTNERSHIP, JACKSON COMPANIES,
AND CAMPGROUNDS, INC.**

Dated: January 15, 2020.

Reply to: **Carmen V. Ganjehsani**
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

January 15, 2020

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: *Cornell Patton et al. v. Prestwick Land Limited Partnership et al.*
Appellate Case No. 2019-000964
RPR File No.: 8930-001

Dear Ms. Kitchings:

I am enclosing for filing the original and six copies of the Motion for Extension of Time of Respondents, Prestwick Land Limited Partnership, Jackson Companies, and Campgrounds, Inc., to file the Initial Respondents' Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our Certificate of Service. Also enclosed is our firm's check in the amount of \$50.00 to cover the filing fee for this Motion.

By copy of this letter, we are serving a copy of this Motion on counsel for the Appellants.

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

Sincerely,



Carmen V. Ganjehsani

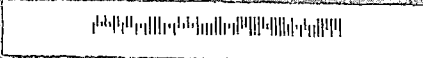
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JAN 16 2020

SC Court of Appeals

Encs.

cc: Gene McCain Connell, Jr.
Douglas C. Baxter (FYI)



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8930-001
**RICHARDSON
 PLOWDEN**
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 770H • Columbia, SC 29202

The Honorable Jenny Abbott Kitchings
 Clerk of Court, S.C. Court of Appeals
 P.O. Box 11629
 Columbia, SC 29211

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