

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Greenville County
The Honorable C. Simmons, Master in Equity

Raymond A. Wedlake, individually and
derivatively, on behalf of all Members of the
Woodington Homeowners' Association, Inc.,

Appellant,

v.

Benjamin Acord, William Craig, Denis Esteve,
and Brian James in their capacity as the current
Board of Directors of the
Woodington Homeowners' Association, Inc.,
and Association Management Group SC, Inc.,

Respondents

Appellate Case No. 2018-001209
Civil Action # 2017-CP-23-06301

RECEIVED
JAN 24 2020
SC Court of Appeals

**APPELLANT'S MOTION FOR FIFTEEN-DAY EXTENSION OF TIME TO FILE
REPLY
TO DEFENDANT'S FILING ANEW OF HIS INITIAL BRIEF FOLLOWING FILING
OF FINAL BRIEF AND FINAL RECORD ON APPEAL
PURSUANT TO RULE 210, OR, IF NOT GRANTED THEN REQUEST FOR PROMPT
RULING**

Appellant, Raymond A. Wedlake, individually and derivatively, on behalf of all Members of the Woodington Homeowners' Association, Inc., by and through its counsel, respectfully moves this Court for a fifteen (15) day extension of time in which to file the its Reply to Respondents new Initial Brief filed by leave of Court following the filing by the parties of the Final Brief and the Final Record on Appeal, approximately one year ago.

The undersigned counsel for Appellant, Grant H. Gibson, Esq. would respectfully show the

Court:

Counsel for Respondent, Ely Grote, Esq., with whom Counsel for Appellant, has conferred regarding this requested 15-day extension, has confirmed he has no objection to such extension.

This is Appellant's Second Request for Extension.

Counsel for Appellant requests such extension on the following grounds:

Counsel for Appellant continues to have medical issues, regarding his Degenerative Disc Disease, which has rendered it difficult to travel from St. Augustine, Florida to Greenville, SC to confer with his Client, Appellant.

After over 45 years of active practice, Counsel for Appellant has closed his office in South Carolina in anticipation of retiring from practice in South Carolina, and has been tied-up with finding substitute counsel and/or withdrawing from cases over the past couple of months;

Thus, Counsel for Appellant needs such additional time to properly prepare the Reply to Defendant's Motion to Dismiss, in accordance with the South Carolina Rules of Appellate Procedure.

THEREFORE, based upon the foregoing, the undersigned counsel for Appellant respectfully petitions this Court for a first extension of fifteen (15) days to complete and serve the Reply and with the requisite Proof of Service.

Respectfully submitted,

GRANT H. GIBSON, ESQ.
Counsel for Appellant – Raymond Wedlake



Grant H. Gibson, Esq. Bar #: 0009269
661 W. Johns Creek Pkwy.
St. Augustine, Fl. 32092
Tel: (864) 630-7471
atty@ggibsonassociates.com

January 22, 2020

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY

Court of Common Pleas

Charles B. Simmons, Jr., Master In Equity

Appellate Case No. 2018-001209

Common Pleas Case No. 2017-CP-23-06301

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as the current Board of Directors of the
Woodington Homeowners' Association, Inc. Respondents.

CERTIFICATE OF SERVICE

The undersigned, Grant H. Gibson, Esq., caused to be mailed the Motion for Extension of Time to Reply, dated this 23rd day of January, to Counsel for Respondent, Ely Grote, Esq., together with attached Motion, also dated this 23rd day of January, by placing them in first class mail, USPS to his address c/o:

McCabe Trotter & Beverly, PC,
P.O. Box 212069 (29221)
Columbia, SC 29221


Grant H. Gibson, Esq.

cc. Ely Grote, Esq.

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY

Court of Common Pleas

Charles B. Simmons, Jr., Master In Equity

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P.O. Box 212069 (29221)
Columbia, SC 29221


Grant H. Gibson, Esq.

cc. Ely Grote, Esq.

G. Gibson & Associates, LLC

Grant H. Gibson, Esq.
661 W. Johns Creek Pkwy.
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atty@ggibsonassociates.com

January 23, 2020

BY: PRIORITY MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Raymond A. Wedlake v. Benjamin Acord, et al
Appellate Case No. 2018-001209
Common Pleas Case No. 2017-CP-23-6301
Motion for Extension of Time to Reply

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SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed our Motion for Extension of Time to Reply to Respondent's New Initial

Brief, following submission of Final Briefs and Final Record on Appeal.


My Response to Mr. Grote's filing is now due January 23, 2020.

Should you have any questions or concerns, please do not hesitate to contact me.

Thank you!

Respectfully submitted,

GRANT H. GIBSON, ESQ.
Counsel for Appellant - Raymond Wedlake



Grant H. Gibson, Esq. Bar #: 0009269
661 W. Johns Creek Pkwy.
St. Augustine, Fl. 32092
Tel: (864) 630-7471
atty@ggibsonassociates.com

Enc. Motion for 15-day Extension of Time to File Reply or in lieu thereof, for prompt Ruling

cc. Ely Grote (via U.S. Mail, with Enclosed Motion)

Grant H. Gibson
661 W. Johns Creek Pkwy
St. Augustine, FL 32092

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JAN 24 2020

SC Court of Appeals

The Honorable Jenny Abbot Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate St.
Columbia, South Carolina 29201