

9/20/25

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

Honorable Steven H. John, Circuit Court Judge

Appellate Case No. 2019-001446

Case No. 2016-CP-22-00961

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**RECEIVED**

JAN 29 2020

SC Court of Appeals

The Gulfstream Café, Inc., .....Respondent,

v.

J. Mark Lawhon, Individually, and  
Palmetto Industrial Development, LLC, ..... Appellants.

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MOTION FOR EXTENSION TO FILE REPLY BRIEF

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J. Mark Lawhon and Palmetto Industrial Development, LLC, pursuant to Rule 240, SCACR, move for a ten-day extension to file their reply brief in this appeal.

According to the file-stamped version of the brief on the South Carolina Appellate Case Management System, The Gulfstream Café, Inc. filed its response brief on January 27, 2020,\* making the reply brief due February 6, 2020. The Appellants received the response brief on January 28, 2020. Between that date and February 6, 2020, counsel for the Appellants is out of the office one day for a hearing on multiple

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\* This brief was filed three days late, as the it was due on January 24, pursuant to this Court's order of January 6, 2020. The brief was not accompanied by a motion for leave to file out of time.

motions in four related cases pending in Florence County one day, drafting a brief in a case pending in the U.S. Court of Appeals for the Fourth Circuit, and mediating a case on the current due date.

Given these other commitments, a ten-day extension is necessary to give counsel sufficient time to analyze the response brief and draft the reply brief. This is the first request for an extension of the reply brief's due date and is made in good faith.

This ten-day extension would make the reply brief due on or before February 17, 2020 (as February 16 is a Sunday).

Respectfully Submitted,



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Wm. Grayson Lambert  
S.C. Bar No. 101282  
BURR & FORMAN LLP  
Post Office Box 11390  
Columbia, S.C. 29211  
(803) 799-9800

Henrietta U. Golding  
BURR & FORMAN LLP  
2411 Oak Street, Suite 206  
Myrtle Beach, SC 29577  
(843) 444-1107

*Counsel for Appellants*

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Honorable Steven H. John, Circuit Court Judge

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**RECEIVED**  
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The Gulfstream Café, Inc., ..... Respondent,

v.

J. Mark Lawhon, Individually, and  
Palmetto Industrial Development, LLC, ..... Appellants.

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CERTIFICATE OF SERVICE

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I certify that this MOTION FOR EXTENSION TO FILE REPLY BRIEF was served on counsel via first class U.S. Mail for the Respondent on January 29, 2020:

George W. Redman, III  
Bellamy, Rutenberg, Copeland, Epps, Gravely & Bowers, P.A.  
P.O. Box 357  
Myrtle Beach, SC 29578  
(843) 448-2400

Simon H. Bloom  
Adam D. Nugent  
Bloom Parham, LLP  
977 Ponce de Leon Ave., NE  
Atlanta, GA 30306  
(404) 577-7710

*Attorneys for Respondent*



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**BURR • FORMAN MCNAIR**

Wm. Grayson Lambert  
glambert@burr.com  
Direct Dial: (803) 753-3261  
Direct Fax: (803) 933-1446

Burr & Forman LLP  
1221 Main Street  
Suite 1800  
Columbia, SC 29201

*Mailing Address*  
Post Office Box 11390  
Columbia, SC 29211

*Office* (803) 799-9800  
*Fax* (803) 753-3278

BURR.COM

January 29, 2020

**VIA COURIER**

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

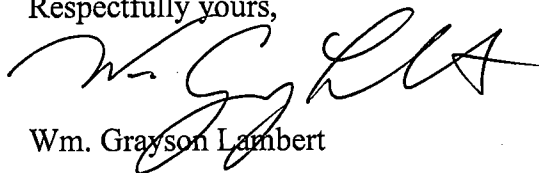
**Re: The Gulfstream Cafe, Inc. v. Palmetto Industrial Development, LLC  
Case No. 2019-001446**

Dear Ms. Kitchings:

Please find enclosed the original and 10 copies of a Motion for Extension to File Reply Brief in the captioned matter, together with this firm's check in the amount of \$50.00. I ask that you please stamp the extra copies and return them to me via the courier.

By copy of this letter, I am herewith serving a copy of the Motion on counsel for Respondent.

Respectfully yours,



Wm. Grayson Lambert

WGL:lg

Enclosure

cc: George W. Redman, III  
Simon H. Bloom  
Adam D. Nugent  
Andrea Pearson

**RECEIVED**

JAN 29 2020

SC Court of Appeals