

92233

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

RECEIVED

The Honorable Benjamin H. Culbertson, Circuit Court Judge

FEB 24 2020

SC Court of Appeals

CASE NO. 2016-CP-26-06495

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

vs.

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 Association, Inc., Defendants

OF WHICH:

Prestwick Land Limited Partnership, Jackson Companies and
Campgrounds, Inc. are Respondents

City of Myrtle Beach, Third-Party Plaintiff,

vs.

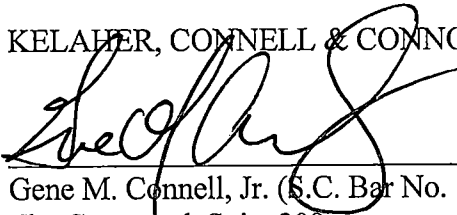
Phil Eaves and Elizabeth Eaves, Third-Party Defendants,
Counterclaimants, Cross-Claimants..... Appellants

MOTION FOR EXTENSION TO FILE APPELLANTS' REPLY BRIEF

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for the Appellants,
moves this Court for an Order extending the time to file Appellants' Reply Brief currently due
February 24, 2020 in the captioned case. The basis of this Motion is Appellants' counsel has
multiple trials starting next week.

WHEREFORE, Appellants' counsel respectfully requests this Court issue its Order granting him an extension to March 5, 2020 to file Appellants' Reply Brief .

Respectfully submitted,

KELAHER, CONNELL & CONNOR, P.C.

Gene M. Connell, Jr. (S.C. Bar No. 1358)
The Courtyard, Suite 209
1500 U. S. Highway 17 North
Post Office Drawer 14547
Surfside Beach, South Carolina 29587-4547
(843) 238-5648 (phone)
(843) 238-5050 (facsimile)
gconnell@classactlaw.net
Attorney for Appellants

February 21, 2020

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

RECEIVED

FEB 24 2020

SC Court of Appeals

CASE NO. 2016-CP-26-06495

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

vs.

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 Association, Inc., Defendants

OF WHICH:

Prestwick Land Limited Partnership, Jackson Companies and
Campgrounds, Inc. are Respondents

City of Myrtle Beach, Third-Party Plaintiff,

vs.

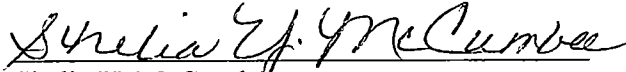
Phil Eaves and Elizabeth Eaves, Third-Party Defendants,
Counterclaimants, Cross-Claimants..... Appellants

PROOF OF SERVICE

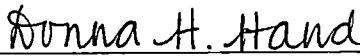
PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of the **Motion for Extension to File Appellants' Reply Brief** on the Respondents, on the 21st day of February, 2020, by depositing a copy of same in the United States Mail, postage prepaid, to:

Carmen V. Ganjehsani, Esquire
Richardson Plowden & Robinson, P..A.
P. O. Drawer 7788
Columbia, SC 29202

Douglas C. Baxter, Esquire.
Richardson Plowden & Robinson, P.A.
P. O. Box 3646
Myrtle Beach, SC 29578


Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 21ST day of February, 2020.


Notary Public for South Carolina
My Commission Expires: 3-28-26

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
GENE M. CONNELL, JR.
L. SIDNEY CONNOR, IV
LISA POE DAVIS
*OF COUNSEL

AREA CODE 843
238-5648
FAX: 238-5050

February 21, 2020

RECEIVED

FEB 24 2020

SC Court of Appeals

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

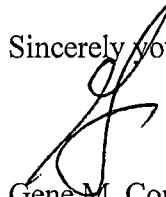
Re: *Cornell Patton, et al. v. Prestwick Land Limited Partnership, et al.*
Appellate Case No. 2019-000964
C/A No. 2016-CP-26-06495
Our File No. 2015-0293C

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of a Motion for Extension to File Appellants' Reply Brief and Proof of Service in the above-captioned matter. I also enclose a check for \$50.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on Respondents through counsel of record.

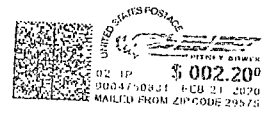
Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr.:sm
Enclosures

cc: Carmen V. Ganjehsani, Esquire
Douglas C. Baxter, Esquire



KELAHER, CONNELL & CONNOR, P.C.
ATTORNEYS AT LAW
P. O. DRAWER 14547
SURFSIDE BEACH, SOUTH CAROLINA 29587

RECEIVED
FEB 24 2020
SC Court of Appeals

Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

