

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUN 29 2020

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

SC Court of Appeals

J. Cordell Maddox, Jr., Circuit Court Judge

Appellate Case No. 2019-002099

Machelle Smith,.....Appellants,

v.

Columbia Sussex Corporation d/b/a Hilton Head Marriott
Resorts and Spa; Columbia Sussex Management, LLC; and
Columbia Properties Hilton Head, LLC.....Respondents.

**RESPONDENTS' FIRST MOTION FOR AN EXTENSION OF TIME
TO FILE INITIAL BRIEF**

TO: THE HONORABLE JUDGES OF THE COURT OF APPEALS OF SOUTH
CAROLINA:

Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules,
Respondents Columbia Sussex Corp. d/b/a Hilton Head Marriott Resorts and
Spa, Columbia Sussex Management, LLC and Columbia Properties Hilton
Head, LLC's (collectively, "Respondents") respectfully move this Court for a

thirty-day (30-day) extension of time to file Respondents' Initial Brief. Respondents' Brief is due on Monday, June 29, 2020.

Counsel has been contentious in efforts to complete Respondents' Initial Brief, but requests additional time due to Counsel's present workload and personal demands relative to the current coronavirus (COVID-19) emergency, and requires additional time to file Respondents' Initial Brief. With the thirty (30) day extension, Respondents' Initial Brief would be due on or before July 29, 2020.

This is Counsel's first request for an extension of time to file Respondent's Initial Brief. Respondents greatly appreciate the Court's time, attention, and assistance with regard to this request.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,
COLLINS & LACY, P.C.



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(803) 256-2660 (voice)
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ATTORNEYS FOR RESPONDENTS

**RESPONDENTS' RETURN TO
APPELLANT'S MOTION TO FILE
OUT OF TIME**

Columbia, South Carolina
June 26, 2020

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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J. Cordell Maddox, Jr., Circuit Court Judge

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Machelle Smith,..... Appellants,

v.

Columbia Sussex Corporation d/b/a Hilton Head Marriott
Resorts and Spa; Columbia Sussex Management, LLC; and
Columbia Properties Hilton Head, LLC..... Respondents.

PROOF OF SERVICE

I hereby certify that I served Respondents' Motion for an Extension of Time to file Respondents' Initial Brief upon all parties, by placing a copy in the United States mail, postage prepaid, to all counsel of record on June 26, 2020, addressed to the following:

COUNSEL SERVED:

John E. Parker, Esquire
Peters Murdaugh Parker Eltzroth & Detrick
Post Office Box 2500
Ridgeland, SC 29936
Counsel for Appellant

Respectfully submitted,

COLLINS & LACY, P.C.

A handwritten signature in cursive script, appearing to read "Christian Stegmaier", is written over a horizontal line.

CHRISTIAN STEGMAIER
cstegmaier@collinsandlacy.com

KELSEY J. BRUDVIG
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ATTORNEYS FOR RESPONDENTS
PROOF OF SERVICE

Columbia, South Carolina
June 26, 2020



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Christian Stegmaier | D: 803.255.0454 | E: cstegmaier@collinsandlacy.com

JUN 29 2020

June 26, 2020

SC Court of Appeals

VIA U.S. MAIL AND EMAIL

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

Re: *Machelle Smith v. Columbia Sussex Corporation d/b/a Hilton Head Marriott Resorts & Spa; Columbia Sussex Management, LLC; and Columbia Properties Hilton Head, LLC*
Appellate Case No. 2019-002099
Claim No. 007164-006563-GD-01
C&L File No. 001831-00104

Dear Ms. Kitchings:

Please find enclosed the original and one copy of the Respondents' Motion for an Extension of Time to file Respondents' Initial Brief in the above-referenced matter.

Please file the original and return one copy to our office in the envelope provided for your convenience.

Pursuant to the Supreme Court's Amended Order "re: Operation of the Appellate Courts During the Coronavirus Emergency" (2020-05-29-02, Appellate Case No. 2020-000447), we have not included any additional copies nor a filing fee for this Motion. If any additional copies or the filing fee are required, please let us know.

By copy of this letter to Appellant's counsel, we are serving same on them.

Thank you for your attention to this matter.

Respectfully,

Christian Stegmaier

CS/net
Encl.

cc (via U.S. Mail and email):

John E. Parker, Esquire, Peters Murdaugh Parker Eltzroth & Detrick

Collins Lacy
ATTORNEYS AT LAW

Post Office Box 12487 | Columbia, SC 29211

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JUN 24 2020

SC Court of Appeals

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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