

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

**Sep 22 2020**

**SC Court of Appeals**

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Honorable Benjamin H. Culbertson, Circuit Court Judge

Case No. 2017-CP-26-08490

**Appellate Case No.: 2020-000933**

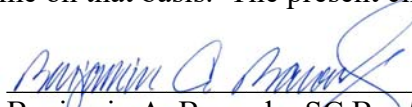
James G. Wiles.....Appellant,

v.

Charles A. Ottwell and  
Jay Specter ..... Respondents.

**RESPONDENT CHARLES A. OTTWELL’S RETURN TO  
APPELLANT’S MOTION FOR AN EXTENSION OF TIME**

Respondent, James Ottwell, opposes the motion of Appellant seeking an extension of time until November 15, 2020 to file his Initial Brief. Respondent joins in the opposition filed by Respondent Jay Specter. Moreover, with regard to the third stated reason set forth by Mr. Wiles in his motion- that a buyer has expressed interest in buying the subject property- such a statement should in no way delay the current litigation process. In the event the parties engage in serious settlement negotiations and a settlement agreement resolving this litigation is imminent, the parties may then move for an extension of time on that basis. The present circumstances present no such basis.



Benjamin A. Baroody, SC Bar # 72533  
BELLAMY, RUTENBERG, COPELAND,  
EPPS, GRAVELY & BOWERS, P.A.  
P.O. Box 357  
Myrtle Beach, SC 29578  
(843) 448-2400  
Counsel for Respondent Charles A. Ottwell

**ADVERSE:**

James G. Wiles, *Pro Se*  
5628 Woodside Avenue  
Myrtle Beach, SC 29577  
843-331-0847

[Jimmythewiles656@gmail.com](mailto:Jimmythewiles656@gmail.com)

Appellant, *Pro Se*

Jay Specter, *Pro Se*  
498 Albemarle Road, Unit 405  
Charleston, SC 29407  
Respondent, *Pro Se*

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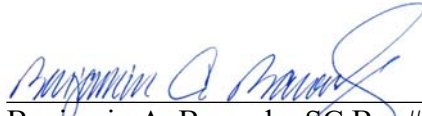
Charles A. Ottwell and  
Jay Specter ..... Respondents.

**PROOF OF SERVICE**

The undersigned, an attorney in this matter for the Respondent, Certifies that I have this 3<sup>rd</sup> day of September, 2020, served copies of Respondent Charles A. Ottwell’s Return to Appellant’s Motion for an Extension of Time upon counsel for the Appellant and co-Respondent by causing them to be deposited in the United States Mail with sufficient postage attached, addressed to:

James G. Wiles, *Pro Se*  
5628 Woodside Avenue  
Myrtle Beach, SC 29577  
843-331-0847  
Appellant, *Pro Se*

Jay Specter, *Pro Se*  
498 Albemarle Road, Unit 405  
Charleston, SC 29407  
Respondent, *Pro Se*



---

Benjamin A. Baroody, SC Bar # 72533  
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P.O. Box 357  
Myrtle Beach, SC 29578  
(843) 448-2400  
Counsel for Respondent Charles A. Ottwell

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EDWARD B. BOWERS, JR.\*  
M. EDWIN HINDS, JR.  
DAVID J. GUNDLING<sup>++</sup>  
DAVID B. MILLER<sup>+</sup>  
C. WINFIELD JOHNSON, III  
DOUGLAS M. ZAYICEK  
MARTIN C. DAWSEY\*  
ROBERT S. SHELTON<sup>+</sup>  
HOWELL V. BELLAMY, III  
ASHLEY P. MORRISON  
GEORGE W. REDMAN, III<sup>+</sup> <sup>\*\*</sup> <sup>++</sup>

\* LLM TAXATION  
\*\* LICENSED IN SC & NC  
<sup>+</sup> CERTIFIED MEDIATOR  
<sup>++</sup> CERTIFIED ARBITRATOR



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Writer's Direct Dial: 843-916-7167  
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September 3, 2020

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

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**Sep 22 2020**  
**SC Court of Appeals**

Re: James Wiles v. Charles Ottwell and Jay Specter  
Appellate Case No. 2020-000933

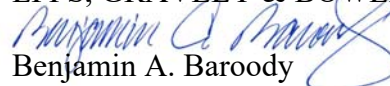
Dear Ms. Kitchings:

Enclosed herewith please find Respondent Charles A. Ottwell's Return to Appellant's Motion for an Extension of Time in the above-referenced matter. As evidenced by the enclosed Proof of Service, I have served both Mr. Wiles and Mr. Specter with a copy of the same.

With kindest regards, I am

Yours very truly,

BELLAMY, RUTENBERG, COPELAND,  
EPPS, GRAVELY & BOWERS, P.A.

  
Benjamin A. Baroody

BAB/dg  
Enclosures as noted  
cc: Client  
James G. Wiles, *Pro Se*  
Jay Specter, *Pro Se*