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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE CHARLESTON COUNTY
COURT OF COMMON PLEAS

MIKELL R. SCARBOROUGH, Master in Equity

Appellate Case No. 2019-001289

Raven’s Run Homeowners Association, Inc., Appellant/Respondent

v.

Crown Pointe Association, Inc., Lois K. Novak as Trustee of the Lois K. Novak Living Trust dated 10/14/2013; Laurie T. Herron and Mark D. Herron; James B. Kubu and Melissa F. Kubu; Leila June Johnson; Danny Ta and Anita McCauley; Robert E. Luby, Jr., and Barbara Luby; Joshua D. Coonce; Lucius Roy Junevicius; Katherine Kinlaw; Thomas K. Kuyk and Melissa Ward; Roland Franklin Wooten, III, and Teresa Key Wooten; Michael P. Horvath; Timothy E. Moylan and Karen G. Moylan; Carl A. Counasse and Maureen Counasse; David A. Frielinghaus and Holly C. Frielinghaus; Christopher S. Finley and Holly M. Finley; Shirley D. Spigner a/k/a Shirley Deanna Spigner; Deirdre C. Knight; Robert Shane Johnson; Eric R. Sigman; Lamar R. Graves, Jr. and Terry W. Graves; Mary Elizabeth Gladden; Philip Wallace and Naomi Grad; Thomas Edwin Davis and Luis Miguel Gonzalez Melchor; John R. Funkhouser and Jennifer L. Funkhouser; Gregory S. Cooper and Jane B. Cooper; Frank C. Jones, Jr. and Elise Ubele Jones; William P. Topping and Kris B. Topping; LaRhonda S. Ptichko; Kenneth L. Tully and Anna J. Tully; Defendants,

Of Whom James B. Kubu and Melissa F. Kubu, and Lelila June Johnson are the
..... Respondents

And Katherine Kinlaw is the Respondent/Appellant

**MOTION FOR EXTENSION TO FILE FINAL BRIEF OF
RESPONDENTS JAMES B. KUBU AND MELISSA F. KUBU**

September 11, 2020

C. Mac Gibson, Jr.
1473 Stuart Engals Blvd.
Mt. Pleasant, South Carolina 29464
(843) 852-4646
Attorney for Respondents
James B. Kubu and Melissa F. Kubu

Other Counsel of Record

William W. Wilkins
Kirsten Elena Small
Nexsen Pruet, LLC
55 E. Camperdown Way
Greenville, South Carolina, 29601

George Hamlin O'Kelley, III
Buist, Byars, & Taylor, LLC
652 Coleman Blvd., Ste. 200,
Mount Pleasant, South Carolina, 29464
Attorneys for Appellant-Respondent
Raven's Run Homeowners Association, Inc.

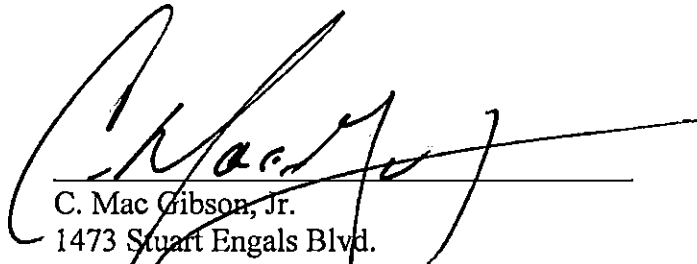
Harold A. Oberman,
Oberman & Oberman, LLC
60 Markfield Drive, Suite 2
Charleston, South Carolina, 29407
Attorney for Respondent-Appellant Katherine Kinlaw

Jeffrey T. Spell
1721 Ashley River Road
Charleston, South Carolina, 29407
Respondent Lelia June Johnson

This Court issued an Order filed on July 28, 2020 to allow Edward K. Pritchard, Jr. to be relieved as counsel for Respondents James B. Kubu and Melissa F. Kubu, and further decreed that the new counsel shall file a notice of appearance within thirty days of the Order. C. Mac Gibson, Jr. on behalf of Respondents James B. Kubu and Melissa F. Kubu (“Kubu”) filed a Notice of Representation on August 21, 2020.

Respondents Kubu through their undersigned attorney respectfully requests: (1) to file a Final Brief as opposed to an Initial Brief on the basis Respondents Kubu do not intend to submit Designation of Matter, and (2) to seek an extension of twenty (20) days from the date this Court adjudicates Respondents Kubu’s Motion for Extension to file their Final Brief.

Respectfully submitted,



C. Mac Gibson, Jr.
1473 Stuart Engals Blvd.
Mt. Pleasant, South Carolina 29464
(843) 852-4646
Attorney for Respondents
James B. Kubu and Melissa F. Kubu

Mt. Pleasant, South Carolina
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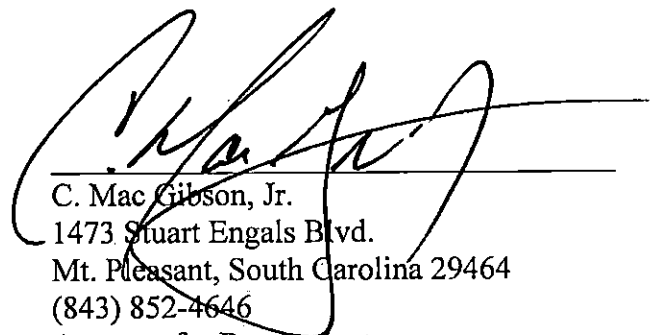
Of Whom James B. Kubu and Melissa F. Kubu, and Lelila June Johnson are the
..... Respondents

And Katherine Kinlaw is the Respondent/Appellant

PROOF OF SERVICE

I certify that I have served the Motion for Extension to File Final Brief of Respondents James B. Kubu and Melissa F. Kubu by depositing a copy of it in the United States Mail, postage prepaid, on September 11, 2020, addressed to the Appellant-Respondent's attorneys of record, William W. Wilkins and Kirsten Elena Small, Nexsen Pruet, LLC, 55 E. Camperdown Way, Greenville, South Carolina, 29601 and George Hamlin O'Kelley, III, Buist, Byars, & Taylor, LLC, 652 Coleman Blvd., Ste. 200, Mount Pleasant, South Carolina, 29464; and Respondent-Appellant Katherine Kinlaw's attorney of record, Harold A. Oberman, Oberman & Oberman, LLC, 60 Markfield Drive, Suite 2, Charleston, South Carolina, 29407; and Respondent Lelia June Johnson's attorney of record, Jeffrey T. Spell, 1721 Ashley River Road, Charleston, South Carolina, 29407.

September 11, 2020



C. Mac Gibson, Jr.
1473 Stuart Engals Blvd.
Mt. Pleasant, South Carolina 29464
(843) 852-4646
Attorney for Respondents
James B. Kubu and Melissa F. Kubu

C. MAC GIBSON, JR.
Attorney at Law
1473 Stuart Engals Blvd.
Mt. Pleasant, SC 29464

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SC Court of Appeals

Telephone: (843) 852-4646

cmacgibson@yahoo.com

September 11, 2020

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

Re: Raven's Run Homeowners Association, Inc. v. Crown Pointe Association, Inc., et al.
Appeal from the Master-in-Equity of Charleston County
Appellate Case No: 2019-001289

Dear Mrs. Kitchings:

As the attorney for Respondents James B. Kubu and Melissa F. Kubu, I have enclosed the following documents pertaining to the above-referenced appeal:

1. An original and seven (7) copies of the Motion for Extension to File Final Brief of Respondents James B. Kubu and Melissa F. Kubu; and
2. Proof of Service.

I would appreciate it if you would file the original and six (6) copies of the Motion for Extension to File Final Brief of Respondents James B. Kubu and Melissa F. Kubu along with the Proof of Service. Also, I would like to receive a filed copy of the Motion for Extension to File Final Brief of Respondents James B. Kubu and Melissa F. Kubu and the Proof of Service. I have enclosed a stamped self-addressed envelope for such filed copies.

I have enclosed a check made payable to the South Carolina Court of Appeals in the amount of \$50.00 for the filing fee.

If you have any questions concerning the enclosed documents, then please contact me.

With kind regards, I am

Sincerely,


C. Mac Gibson, Jr.

Enclosures (as stated)

cc: Client (w/ encls. via email)

Attorneys of Record (via electronic mail)

CERTIFIED MAIL



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C. Mac Gibson, Jr.
Attorney at Law
1473 Stuart Engals Blvd.
Mt. Pleasant, SC 29464

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9/14