

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

The Honorable Marvin H. Dukes, III
Beaufort County
Trial Court Case No. 2018-CP-07-1622

APPELLATE CASE NO. 2020-000862

RECEIVED

Oct 08 2020

SC Court of Appeals

J & W Corporation Of Greenwood,

Appellant,

vs.

Broad Creek Marina Of Hilton Head, LLC;
Broad Creek Marina Operations, LLC;
Broad Creek Marina Properties, LLC; and
Broad Creek Development, LLC,

Respondents.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Appellant requests a thirty (30) day extension of the deadline for filing and serving its Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. The current deadline is October 16, 2020. The requested extended deadline would be November 16, 2020.

This is the second request for an extension of this deadline. Counsel for Respondents does not object to this Motion.

[signature page follows]

s/Thomas C. Taylor

Thomas C. Taylor, Esq.

LAW OFFICE OF THOMAS C. TAYLOR, LLC.

Post Office Box 5550

Hilton Head Island, South Carolina 29938

South Carolina Bar Number: 5499

Telephone: 843-785-5050

Facsimile: 843-785-5030

Email: tom@thomastaylorlaw.com

ATTORNEY FOR APPELLANT

J & W CORPORATION OF GREENWOOD

Hilton Head Island, South Carolina

October 8, 2020

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PROOF OF SERVICE

I hereby certify that this law firm represents the Appellant in the above-captioned matter and that on the date below, in Hilton Head Island, South Carolina, I served a copy of the forgoing on the following persons via electronic mail to their AIS E-mail address:

Documents Served:

**APPELLANT J & W CORPORATION OF
GREENWOOD'S MOTION FOR EXTENSION**

Parties Served:

Ellis R. Lesemann, Esq.
Lesemann & Associates, LLC
418 King Street, Suite 301
Charleston, SC 29403
erl@lalawsc.com

s/Thomas C. Taylor

Thomas C. Taylor, Esq.
LAW OFFICE OF THOMAS C. TAYLOR, LLC.
Post Office Box 5550
Hilton Head Island, South Carolina 29938
South Carolina Bar Number: 5499
Telephone: 843-785-5050
Facsimile: 843-785-5030
Email: tom@thomastaylorlaw.com

**ATTORNEY FOR APPELLANT
J & W CORPORATION OF GREENWOOD**

Hilton Head Island, South Carolina

October 8, 2020

Tom Taylor

From: Tom Taylor
Sent: Thursday, October 8, 2020 2:23 PM
To: 'Ellis Lesemann'
Cc: Donna P. Taylor, Legal Assistant (donna@thomastaylorlaw.com)
Subject: Motion for Extension to file initial brief in 2020-000862, J & W v. BCM
Attachments: Taylor to Clerk Kitchens of 10.8.2020 with Motion for Extension.pdf; Proff of Service of Motion for Extension in 2020-000862, 10.8.2020.pdf; Motion to Extend Time to File Initial Brief in 2020-000862, 10.8.2020.pdf

Ellis—Good afternoon. Thank you for consenting to the request for a 30 day extension to file our initial brief and designation of matter. Please find attached an electronic copy of the Appellant's Motion for Extension in the matter of J & W Corporation of Greenwood and BCM. We are serving the Motion for Extension upon you via e-mail in compliance with the procedure set forth in the Supreme Court's Order dated March 20, 2020, Re: Operation of the Appellate Courts during the Coronavirus Emergency, which provides pursuant to Section (g)(3); "this court authorizes a lawyer admitted to practice law in this state to serve a document on another lawyer admitted to practice law in this state using the lawyer's primary e-mail address listed in the Attorney Information System (AIS)." We have confirmed in the AIS your email to which we are serving this Motion For Extension.

Thank you.

Tom

Thomas C. Taylor

Law Office of Thomas C. Taylor, LLC
22 Bow Circle, Suite A
Hilton Head, SC 29928
843-785-5050 (office)
843-785-5030 (fax)
843-301-6900 (cell)

Mailing Address:
P.O. Box 5550
Hilton Head, SC 29938

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This law firm is practicing social distancing in accordance with the recommendations of the CDC and SCDHEC. This means we are limiting face-to-face interactions at this time in the following ways:

- 1. Until at least August 30, 2020, client meetings will take place by telephone.**
- 2. Until at least August 30, 2020, our office will be locked to outside guests.**
- 3. Documents that need to be delivered should be sent electronically or slipped under the office door.**
- 4. If you must come to the office to prepare for a hearing or in an emergency situation, we will make special accommodations in advance.**
- 5. If you need to schedule an appointment, a special accommodation or have questions, please call us at (843)785-5050.**

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applicable law unless otherwise expressly stated. The intentional interception or dissemination of electronic mail not belonging to you, may violate federal and/or state law.

IRS CIRCULAR 230 NOTICE: Internal Revenue Service regulations generally provide that, for the purpose of avoiding tax penalties, a taxpayer may rely only on formal written advice meeting specific requirements. Any tax advice in this message, or in any attachments to this message, does not meet those requirements. Accordingly, any such tax advice was not intended or written to be used, and it cannot be used, for the purpose of avoiding federal tax penalties that may be imposed on you or for the purpose of promoting, marketing or recommending to another party any tax-related matters.

LAW OFFICE OF
THOMAS C. TAYLOR, LLC

ADMITTED TO THE UNITED STATES
SUPREME COURT BAR

ADMITTED IN SOUTH CAROLINA,
COLORADO AND GEORGIA

CERTIFIED SC CIRCUIT
COURT MEDIATOR

22 BOW CIRCLE
SUITE A
HILTON HEAD ISLAND, SC 29928

TELEPHONE 843-785-5050

TELECOPIER 843-785-5030

www.thomastaylorlaw.com • tom@thomastaylorlaw.com

MAILING ADDRESS
P.O. BOX 5550
HILTON HEAD ISLAND, SC
29938

October 8, 2020

Via E-Mail – ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk of Court
SOUTH CAROLINA COURT OF APPEALS
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

Re: J & W Corporation of Greenwood v. Broad Creek Marina of Hilton Head, LLC; Broad Creek Marina Operations, LLC; Broad Creek Marina Properties, LLC; and Broad Creek Development, LLC.
Appellate Case No.: 2020-000862

Dear Madam Clerk:

I am transmitting herewith for filing, a Motion for Extension with respect to the above-referenced matter.

Thank you for your consideration of this request. Please contact me at your convenience if you have any questions or need further information.

Cordially yours,

LAW OFFICE OF THOMAS C. TAYLOR, LLC



Thomas C. Taylor

TCT/dpt

Enclosures

cc: Ellis Lesemann, Esq., via email transmittal
Wick Scurry, via e-mail transmittal