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Nov 25 2020

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY COURT OF COMMON PLEAS

Deadra Jefferson, Circuit Court Judge

Maite Murphy, Circuit Court Judge

Appellate Case No. 2019-001951

Alan G. Nix, Norma J. Nix
and the Estate of Norma J.

Nix.....Appellants

v.

Churchill Park, Churchill Park HOA, Churchill Park Homeowners' Association, Inc., Churchill at Park West Association, Inc., Churchill Property Owners Association, Churchill Park Property Owners Association, Churchill Park at Parkwest, Inc., Churchill Park at Park West Association, Inc., Churchill Park @ Park West Association, Inc., Southern Community Services, LLC, Park West Development Corp., LPPM, Inc., **McCabe, Trotter & Beverly, PC**, Dobson Builders, **Stephanie Trotter, Ryan McCabe, Jaime McSweeney**, Larry Riddlehoover, Mike Hurd, Sheri Cothran, David Brown, Catherine Brown, Stephen Sumner, Richard Riccoboni, Rick Cumberland, Park West Master Association, Inc., Park West Amenity Association, Inc., C. Richard Dobson, Builders, Inc., DR Horton, Inc., Brian Gardner, Venture Management of South Carolina, Inc., Dodds & Hennessey, LLP, Kim Atkeson, Jennifer Williamson, Jessica Turner, Kevin Steelman, Landtech Development, LLC, Landtech Incorporated of South Carolina, Land Tech Charleston, LLC, Rogers, Townsend & Thomas, PC, Henry Munn, Charleston County (Christine Smith), Judge Mikell Scarborough, Sandlapper Reporting, LLC, William H. Sloan, Sloan Law Firm, Individual Agents, Assigns, Attorneys, Accountants, Employees, Officers, Directors,

Independent Contractors, Investors, Successors,
Predecessors, Insurers, Representatives, Parents, Sister
and Affiliated Entities, Partners, Members of all Persons
Who Might be Liable.....Respondents.

**Motion for Extension of Time to File Initial Brief and Designation of Matter of
Respondents McCabe, Trotter & Beverly, PC, Stephanie Trotter, Ryan McCabe, and
Jaime McSweeney**

Respondents McCabe, Trotter & Beverly, PC, Stephanie Trotter, Ryan McCabe, and Jaime McSweeney (“these Respondents”) move this Court for an extension of time to file their initial brief and designation of matter to be included in the record on appeal. These Respondents move pursuant to Rule 240, SCACR and the Supreme Court of South Carolina’s Order of May 29, 2020, regarding the Operation of Appellate Courts During the Coronavirus Emergency (Appellate Case No. 2020-000447).

Appellant(s) filed his/their initial brief and designation of matter on or about September 13, 2020. On September 25, 2020, these Respondents filed a Motion to Strike/Dismiss. This Court issued an Order on November 9, 2020: (a) granting the Motion to Dismiss as to Appellant Norma J. Nix and the Estate of Norma J. Nix; (b) denying the Motion to Dismiss as to Appellant Alan Nix; (c) denying the Motion to Strike; and (d) giving the Respondents thirty days from November 9, 2020 (December 9, 2020), to file their initial briefs and designations of matter.

Counsel for these Respondents needs additional time and requests until January 22, 2021, to submit his clients’ initial brief and designation of matter. Counsel’s workload/schedule, the holidays and health issues with counsel’s primary assistant (Covid-19) make this request necessary. Therefore, counsel for these Respondents requests an extension until January 22, 2021, to file his clients’ initial

brief and designation of matter. This is counsel's first such request for an extension for the initial brief and designation of matter, and counsel does not expect to file any others.

Respectfully submitted,

/s/ Andrew W. Countryman

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**Counsel for Respondents McCabe,
Trotter & Beverly, PC, Stephanie
Trotter, Ryan McCabe and Jaime
McSweeney**

November 25, 2020.