

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Master-In-Equity

The Honorable Marvin H. Dukes, III, Master-In-Equity
Beaufort County

Appellate Case No. 2020-000862
Trial Court Case No. 2018-CP-07-1622

J & W Corporation of Greenwood,

Appellant,

v.

Broad Creek Marina of Hilton Head, LLC;
Broad Creek Marina Operations, LLC;
Broad Creek Marina Properties, LLC;
Broad Creek Marina Development, LLC,

Respondents,

RESPONDENTS' MOTION FOR EXTENSION

Ellis R. Lesemann
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418 King Street, Suite 301
Charleston, South Carolina 29403
(843) 724-5155
Attorneys for Respondents

COME NOW Respondents Broad Creek Marina of Hilton Head, LLC, Broad Creek Marina Operations, LLC, Broad Creek Marina Properties, LLC, and Broad Creek Marina Development, LLC (collectively, “Respondents”) and hereby request an extension of time to file the Initial Brief of Respondents and Respondents’ Designation of Matter to be Included in the Record on Appeal in the above-captioned appeal. The current deadline for filing Respondents’ Initial Brief and Designation of Matter is Wednesday, December 16, 2020. With the extension of time requested herein, Respondents’ Initial Brief and Designation of Matter will be due on Friday, January 15, 2021.

As grounds for this Motion, Respondents state as follows:

1. Due to pending obligations relating to other matters, counsel for Respondents anticipates that they will not have sufficient time to prepare and file Respondents’ Initial Brief.
2. The deadline for filing the Initial Brief of Respondents has not been previously extended. Counsel for Appellant J & W Corporation of Greenwood has consented to the 30-day extension of the deadline for Respondents’ Initial Brief and Designation of Matter.

Respectfully submitted,

By: s/Ellis R. Lesemann
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Attorneys for Respondents

December 9, 2020
Charleston, South Carolina

CERTIFICATE OF SERVICE

I hereby certify that I have this date, mailed, postage prepaid, a true and correct copy of the **Respondents' Motion for Extension** to the following counsel of record:

Thomas C. Taylor, Esq.
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Attorneys for Appellant

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Dec 09 2020
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By: s/Michelle A. Matthews
Michelle A. Matthews

December 9, 2020
Charleston, South Carolina