

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
Michelle A. Matthews
Lesemann & Associates LLC
418 King Street, Suite 301
Charleston, South Carolina 29403
(843) 724-5155
Attorneys for Respondents

RECEIVED

Dec 09 2020

SC Court of Appeals

RECEIVED

DEC 14 2020

SC Court of Appeals

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
Ellis R. Lesemann (S.C. Bar No. 15315)
erl@lalawsc.com
Michelle A. Matthews (S.C. Bar No. 100685)
mam@lalawsc.com
LESEMANN & ASSOCIATES LLC
418 King Street, Suite 301
Charleston, SC 29403
(843) 724-5155

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.
Law Office of Thomas C. Taylor, LLC
22 Bow Circle, Suite A
Hilton Head, SC 29928

Attorneys for Appellant

RECEIVED

Dec 09 2020

SC Court of Appeals

By: s/Michelle A. Matthews
Michelle A. Matthews

December 9, 2020
Charleston, South Carolina

LESEMANN & ASSOCIATES LLC

CIVIL LITIGATION | BUSINESS DISPUTES

ELLIS R. LESEMANN
EMAIL: erl@lalawsc.com

418 KING STREET, SUITE 301
CHARLESTON, SOUTH CAROLINA 29403

TELEPHONE (843) 724-5155

DIRECT: (843) 724-5156
WEBSITE: www.lalawsc.com

December 10, 2020

RECEIVED

DEC 14 2020

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court for SC Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: *J & W Corporation of Greenwood v. Broad Creek Marina, LLC, et al.*
Appellate Case No.: 2020-000862

Dear Ms. Kitchings:

Enclosed please find this firm's check made payable to the South Carolina Court of Appeals in the amount of Fifty and 00/100 Dollars (\$50.00) representing the applicable filing fee for Respondents' Motion for Extension filed in connection with the above-referenced appeal. Also enclosed is the file-stamped copy of Respondents' Motion for Extension.

Thank you for your assistance with this matter.

With best regards,



Ellis R. Lesemann

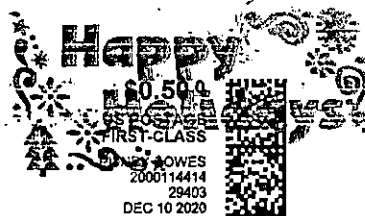
ERL/ajs
Enclosure

cc: Thomas C. Taylor, Esq.

LESEMANN & ASSOCIATES LLC
418 King Street, Suite 301
Charleston, SC 29403

CHARLESTON SC 294

10 DEC 2020 PM 3 L



RECEIVED

DEC 14 2020

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court for SC Court of Appeals
Post Office Box 11629
Columbia, SC 29211

29211-162929

