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**Jan 13 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Master-In-Equity

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

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

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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,

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Respondents,

**RESPONDENTS' MOTION FOR EXTENSION**

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Ellis R. Lesemann  
Michelle A. Matthews  
Lesemann & Associates LLC  
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 a two-week 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 Friday, January 15, 2021. With the extension of time requested herein, Respondents’ Initial Brief and Designation of Matter will be due on Friday, January 29, 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. Counsel for Respondents has had numerous staffing issues due to employees testing positive for Covid-19. Staffing issues include one attorney’s wife going into Covid-19 induced premature labor and giving birth 6 weeks early.
3. Counsel for Appellant J & W Corporation of Greenwood has consented to the two-week 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*

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Charleston, South Carolina

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**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*

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

January 13, 2021  
Charleston, South Carolina