

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**  
**Jan 21 2021**  
SC Court of Appeals

---

Appeal from Charleston County  
Court of Common Pleas, Ninth Judicial Circuit  
Hon. Judge Bentley D. Price, Circuit Court Judge, Presiding

---

2020-001030

---

Eugene J. Zurlo, Individually and as Co-Trustee of the Eugene J. Zurlo Living Trust Dated December 11, 1997; 1776, LLC; Beach Fenwick, LLC; The Beach Company; Seamon, Whiteside & Associates, Inc.; Penny Creek Associates, LLC; John Doe and Mary Roe.....Respondents,

Versus

Maybank 2754, LLC..... Appellant.

---

**MOTION to EXTEND THE TIME  
TO FILE THE INITIAL BRIEF AND  
DESIGNATION OF MATTER FOR THE  
RECORD ON APPEAL**

---

s/Scarlet B. Moore

---

Scarlet B. Moore, #72534  
Attorney for Appellant, Maybank 2754, LLC  
P.O. Box 17615  
Greenville, S.C. 29606  
(864) 214-5805  
(864) 752-0930 (FAX)

January 21, 2021

**NOW INTO COURT**, comes the Appellant Maybank 2754, LLC, who respectfully requests that this Honorable Court will grant to counsel an extension in which to file the Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal. This matter is the consolidation of multiple notices of appeal filed by Appellant relative to orders entered in a matter filed in the Charleston County Court of Common Pleas relative to (in very simplified terms) a dispute regarding a land easement. Undersigned appellate counsel did not represent her client in the matters at the trial level, and requires additional time to review the extensive record in this matter to prepare the Initial Brief and Designation of Matter for the Record. Undersigned counsel respectfully requests an extension of thirty (30) days, until Monday, February 22, 2021.

Respectfully Submitted,

s/Scarlet B. Moore

---

Scarlet B. Moore, #72534  
Attorney for Appellant,  
Maybank 2754, LLC  
P.O. Box 17615  
Greenville, S.C. 29606  
(864) 214-5805  
(864) 752-0930 (FAX)

Greenville, South Carolina  
January 21, 2021