

RECEIVED

May 11 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The 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

Maybank 2754, LLC.....Appellant,

Versus

Eugene 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.

**MOTION TO FILE
THE APPELLANT’S REPLY BRIEF
OUT OF TIME, AND MOTION FOR
EXTENSION OF TIME TO FILE THE
APPELLANT’S REPLY BRIEF**

s/Scarlet B. Moore

Scarlet B. Moore, #72534
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May 11, 2021

NOW INTO COURT, comes the Appellant Maybank 2754, LLC, who moves this Honorable Court for an Order permitting the Appellant to file the Appellant's Reply Brief out of time, and for an extension of time to file the Appellant's Reply Brief, for the following reasons, to wit:

I serve as the primary caregiver and hold power of attorney for my ex-husband, Gary, with whom I share two beautiful children. Gary was diagnosed with stage four kidney cancer on January 24, 2021, and has been undergoing multiple surgeries and treatments since this date, less than four months ago. It has been challenging for me trying to balance my obligations in my practice, and taking care of Gary's medical and financial needs – and also providing much emotional support for my children who are experiencing one of the most difficult times in their lives. On April 7, Gary underwent surgery to remove his affected kidney, and had complications from the surgery due to hospital negligence. The past month has been very trying for our family, having to completely rearrange our schedules to be with Gary at the hospital, and to continually monitor every medical decision that affects him. Last Thursday, May 6, 2021, we made the difficult decision to place Gary in hospice care, and he is receiving wonderful care from McCall Hospice House in Simpsonville. I am respectfully asking for consideration from this Court of my current situation, and assist me in meeting my obligations to my appellate clients. I am requesting an extension until Friday, May 28, 2021.

WHEREFORE, the Appellant prays that this Honorable Court will permit the Appellant to file the Appellant's Reply Brief out of time, and for an extension until Friday, May 28, 2021, to file the Appellant's Reply Brief.

Respectfully Submitted,

s/Scarlet B. Moore

Scarlet B. Moore, #72534

Attorney for Appellant

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CERTIFICATE OF SERVICE

I certify that on this date, May 11, 2021, I have served the **Appellant's Motion to File the Appellant's Reply Brief Out of Time and for an Extension of Time to Serve the Appellant's Reply Brief**, on opposing counsel to their respective e-mail addresses, pursuant to the Order of the Supreme Court Appellate Case No, 2020-000447(g)(3):

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Respectfully Submitted,

s/Scarlet B. Moore

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May 11, 2021
Greenville, South Carolina