

**RECEIVED**

**Nov 30 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

CASE NO: 2019-CP-10-06058

Bay Light, LLC,.....Respondent

v.

Westgate Office Park Landowners' Maintenance Association Inc.....Appellant

MOTION TO EXTEND TIME FOR FILING OF APPELLANT INITIAL BRIEF

The Appellant, Westgate Office Park Landowners' Maintenance Association Inc moves before this honorable court to request an extension of time to file its initial brief. Based on the November 2, 2021 letter from the Clerk of Court, Appellant's initial brief is due December 2, 2021. Appellant's counsel requests a forty (40) day extension; thus, on Tuesday January 11, 2022, appellant would need to file and serve its initial brief and designation of matter. The basis for this request is as follows:

A. Counsel has long standing plans to holiday in Antarctica beginning December 13, 2021 and returning to Charleston on December 25, 2021, Christmas Day.

B. On November 4, 2021, I learned that my seventy-seven (77) year old mother's ability to care for herself had diminished; thus, requiring me to move her into my home. As her only child and her sole caregiver, I am responsible for safety and general wellbeing. Due to my pending trip, I

am actively engaged in seeking out a permanent caregiver for my Mother and attempting to secure her stable permanent housing, while serving as the sole person providing for her daily care.

For the foregoing reasons, Appellant's Counsel respectfully requests and extension until to January 11, 2022 to file and serve the initial brief a designation.

November 30, 2021

s/Erika V. Harrison  
Erika V. Harrison  
SC BAR No. 73024  
92 Line St.  
Charleston, SC 29403  
843.302.1900  
*Attorney for Appellant*

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PROOF OF SERVICE

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certify that I have served the Motion for Extension to File and Serve Appellant's Initial Brief and Designation of Matter on Respondent Bay Light, LLC by electronic mail and depositing a copy of it in the United States Mail, postage prepaid, on November 30, 2021, addressed to its attorney of record, Stan Barnett, 305 North Civitas St. Mt. Pleasant, SC

November 30, 2021

s/Erika V. Harrison  
Erika V. Harrison  
SC BAR No. 73024  
92 Line St.  
Charleston, SC 29403  
843.302.1900  
*Attorney for Appellant*



THE LAW OFFICE OF  
**ERIKA V. HARRISON**

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Via US MAIL

VIA EMAIL

South Carolina Court of Appeals  
Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29201

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**SC Court of Appeals**

November 30, 2021

**Re:** Bay Light, LLC v. Westgate Office Park Landowner's Maintenance Association, Inc.  
Case No.: 2019 -CP-10-6058  
EVH File No.: 2020.Westgate.0001

Dear Sir or Madam:

Enclosed please find Appellant's (Defendant) Westgate Office Park Landowner's Maintenance Association, Inc.'s Motion for Extension to File and Serve Initial Brief and Designation of Matter, and a check for the filing fee.

If you should have any questions regarding this Motion, please feel free to call me.

With kindest regards,

With kindest regards,

Yours truly,

A handwritten signature in dark ink that reads 'Erika V. Harrison'.

Erika V. Harrison

EVH:evh

cc: Stan Barnett (via email)  
Arthur McFarland (via email)