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Dec 29 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Carmen Mullen

Appellate Case No. 2021-000862

Lawrence Leary and the Old Town Bluffton Inn, LLC..... Appellant,

v.

Zachary Z. Zoul, and Zoul Hospitality, LLC d/b/a Hospitality Advisors Group,..... Respondents.

**FIRST MOTION FOR EXTENSION BY ALL RESPONDENTS LAWRENCE LEARY
AND THE OLD TOWN BLUFFTON INN, LLC**

Respondents, Lawrence Leary and the Old Town Bluffton Inn, LLC, moves this Court for a thirty-day extension in which to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. The undersigned counsel is extensively involved in the utility litigation in Cleveland Ohio, Respondents' counsel was also on his first vacation for the past several years during this time period. Respondents Initial Brief is currently due on December 31, 2021. Respondent respectfully requests an extension of thirty days, making the Initial Brief and Designation of Matter due on January 31, 2021.

Signature Page to Follow

Respectfully submitted,

December 25, 2021

/s/ Gregory Michael Galvin
Gregory Michael Galvin, Esq.
Galvin Law Group, LLC
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Bluffton, SC 29910
(843) 227-2231
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Carmen Mullen, Common Pleas Judge

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Zachary Z. Zoul, and Zoul Hospitality, LLC d/b/a Hospitality Advisors Group,
Respondents

v.

Lawrence Leary and Old Town Bluffton Inn, LLC,
Appellants.

I hereby certify that I served a copy of the **FIRST MOTION FOR EXTENSION BY ALL RESPONDENTS LAWRENCE LEARY AND THE OLD TOWN BLUFFTON INN, LLC** electronically, or by mailing a true and correct copy of same to the following, with adequate postage affixed thereto, addressed as follows on the day set forth below:

Ward Borden, Esq.
Jones Simpson and Newton, PA
PO Box 1938
Bluffton, SC 29910
Attorney(s) for All Appellants

GALVIN LAW GROUP, LLC

/s/ Gregory Michael Galvin, Esq.

Gregory Michael Galvin, Esq.
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Bluffton, South Carolina 29910
843-227-2231
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ggalvin@galvinlawgroup.com

Bluffton, South Carolina
25th day of December 2021



GALVIN LAW GROUP LLC

23 Plantation Park Dr, (Physical)
P.O. Box 887 (Mailing)
Bluffton, SC 29910

843-227-2231 (Phone)
888-362-0714 (Fax)

December 25, 2021

Via U.S. Mail

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
ctappfilings@sccourts.org

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Dec 29 2021

SC Court of Appeals

Re: Zachary Z. Zoul, and Zoul Hospitality, LLC d/b/a Hospitality Advisors Group,
Respondents v. Lawrence Leary and Old Town Bluffton Inn, LLC, Appellants
Appellate Case No.: 2021-000862

Dear Ms. Kitchings,

Enclosed herewith please find my Motion for Extension and proof of service of the Motion to opposing counsel for the referenced appeal.

I also wanted to alert the Court that the transcript has arrived and is in my possession.

By copy of this letter to the attorneys for the Respondents, I am serving them with a copy of the enclosed documents as well.

Thank you in advance for your help and happy holidays.

Sincerely,

/s/ Gregory Michael Galvin
Gregory Michael Galvin, Esq.

cc: Ward Borden, Esq.