

**From:** [Clark, Tyler P.](#)  
**To:** [Court Of Appeals Filings](#)  
**Subject:** FW: Zoul vs, Leary - Motion for Extension  
**Date:** Friday, December 31, 2021 8:36:38 AM  
**Attachments:** Outlook-xlx5ry21.png  
2021-12-25 - Letter EN Extension.pdf  
2021-12-25----Motion for Extension and Proof of Service.pdf

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**From:** Ward Borden <WBorden@jsplaw.net>  
**Sent:** Monday, December 27, 2021 12:12 PM  
**To:** Clark, Tyler P. <tpclark@sccourts.org>  
**Cc:** Gregory M. Galvin (ggalvin@galvinlawgroup.com) <ggalvin@galvinlawgroup.com>; Marty McCay <mmccay@galvinlawgroup.com>; Weston Newton <WNewton@jsplaw.net>  
**Subject:** FW: Zoul vs, Leary - Motion for Extension

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Clerk, S.C. Court of Appeals –

Please note that I am retransmitting an e-mail sent a few minutes ago, which apparently did not reach the intended e-mail address. The message is noted below. If there are questions, please contact me. Thank you and sorry for any confusion.

Ward Borden (S.C. Bar #10117)  
JONES, SIMPSON & NEWTON, P.A.  
P.O. Box 1938  
Bluffton, South Carolina 29910  
(843) 706-8868  
Counsel for Respondent Zachary Zoul

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**From:** Ward Borden  
**Sent:** Monday, December 27, 2021 11:57 AM  
**To:** [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
**Cc:** Gregory M. Galvin ([ggalvin@galvinlawgroup.com](mailto:ggalvin@galvinlawgroup.com)) <[ggalvin@galvinlawgroup.com](mailto:ggalvin@galvinlawgroup.com)>; Marty McCay <[mmccay@galvinlawgroup.com](mailto:mmccay@galvinlawgroup.com)>; Weston Newton <[WNewton@jsplaw.net](mailto:WNewton@jsplaw.net)>  
**Subject:** FW: Zoul vs, Leary - Motion for Extension

Dear Clerk, Court of Appeals –

I am writing on behalf of the Respondent in this appeal, Zachary Zoul. We received a copy of Appellants' Motion for Extension of Time filed and served on or about December 25, 2021. The Motion for Extension represents that the Respondent is moving for the extension of time. That is inaccurate. The Appellants on appeal are requesting the extension of time to file and serve

Appellants' Initial Brief and Appellants' Designation of Matter. The Respondent at this time is not seeking such relief.

At the Circuit Court level, Zachary Zoul [now Respondent in this appeal] was Plaintiff. Lawrence Leary and Old Town Bluffton Inn, LLC [Appellants here] were Defendants. Accordingly, it is accurate to state that the parties opposing Zachary Zoul are the parties seeking an extension of time, and inaccurate to state or file motion that Zachary Zoul is seeking any extension of time presently.

Ward Borden (S.C. Bar # 10117)  
JONES, SIMPSON & NEWTON, P.A.  
P.O. Box 1938  
Bluffton, South Carolina 29910  
(843) 706-8868  
Counsel for Respondent Zachary Zoul

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**From:** Greg Galvin <[ggalvin@galvinlawgroup.com](mailto:ggalvin@galvinlawgroup.com)>  
**Sent:** Saturday, December 25, 2021 10:39 AM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** Ward Borden <[WBorden@jsplaw.net](mailto:WBorden@jsplaw.net)>; Marty McCay <[mmccay@galvinlawgroup.com](mailto:mmccay@galvinlawgroup.com)>  
**Subject:** Zoul vs, Leary - Motion for Extension

Attached is a copy of the Motion for an extension, proof of service and cover letter.

I hope everyone has a safe and happy holiday season.

Greg



**Gregory Michael Galvin, Esq. | Attorney at Law**

Galvin Law Group, LLC  
23 Plantation Park, Suite 503 • PO Box 887  
Bluffton, SC 29910  
843-227-2231 phone  
888-362-0714 fax  
[ggalvin@galvinlawgroup.com](mailto:ggalvin@galvinlawgroup.com)

