

From: [Clark, Tyler P.](#)
To: [Court Of Appeals Filings](#)
Subject: FW: Zoul vs, Leary - Motion for Extension
Date: Monday, January 31, 2022 6:07:25 AM
Attachments: Outlook-n4e2s0lr.png
2022-01-29---Leary Motion for Extension.pdf

From: Greg Galvin <ggalvin@galvinlawgroup.com>
Sent: Saturday, January 29, 2022 10:31 AM
To: Ward Borden <WBorden@jsplaw.net>
Cc: Clark, Tyler P. <tpclark@sccourts.org>; Marty McCay <mmccay@galvinlawgroup.com>; Weston Newton <WNewton@jsplaw.net>
Subject: Re: 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. ***

I realized that I did not replace an error in the title of the document. This is the corrected version. I have updated the online version with this file.



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From: Greg Galvin
Sent: Tuesday, December 28, 2021 10:25 AM
To: Ward Borden <WBorden@jsplaw.net>
Cc: tpclark@sccourts.org <tpclark@sccourts.org>; Marty McCay <mmccay@galvinlawgroup.com>; Weston Newton <WNewton@jsplaw.net>
Subject: Re: Zoul vs, Leary - Motion for Extension

Mr Borden is correct. Please let me know if the court would like me to amend my filing. My apologies I do not generally appear in the appellate court. Hope everyone had a wonderful holiday.

Gregory Michael Galvin, Esq
Galvin Law Group, LLC

On Dec 27, 2021, at 12:12 PM, Ward Borden <WBorden@jsplaw.net> wrote:

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

From: Ward Borden

Sent: Monday, December 27, 2021 11:57 AM

To: ctappfilings@scchcourts.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

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.
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(843) 706-8868

Counsel for Respondent Zachary Zoul

From: Greg Galvin <ggalvin@galvinlawgroup.com>

Sent: Saturday, December 25, 2021 10:39 AM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: Ward Borden <WBorden@jsplaw.net>; Marty McCay <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