

IN THE STATE OF SOUTH CAROLINA

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In the Court of Appeals

Feb 25 2022

SC Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

H. Steven DeBerry, IV, Circuit Court Judge  
And  
R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No. 2022-000152  
Trial Court Case No. 2019-CP-26-01211

Gregory Cutlip, individually and as a member of the Legends  
Property Owners Association, Inc. and Parkland Property Owners  
Association, Inc., .....Respondent,

v.

LDY Properties, LLC, Estate and/or Trust of Larry D. Young,  
Legends Property Owners Association, Inc., Parkland Property Owners  
Association, Inc., Legends Properties, LLC, New Town Management, LLC,  
Michael R. Latta, Marienne Johnson, Carl A. Rubano, Camden  
C. McCarl, Robert L. Schechter, Richard Apolenis, John K. Manley,  
Michael Marino, Legends Golf Holding, LLC, Jigger Holdings, LLC,  
and Daniel Larry Young, Jr.,.....Defendants,

Of which LDY Properties, LLC; Larry D. Young; Legends Properties, LLC;  
and Legends Golf Holding, LLC are the Appellants.

**APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE RETURNS TO  
RESPONDENT'S MOTION TO DISMISS, MOTION TO LIFT THE AUTOMATIC  
STAY, AND MOTION FOR COSTS AND/OR SANCTIONS**


Appellants respectfully request a fourteen (14) day extension to file their Returns to  
Respondent's Motion to Dismiss, Motion to Lift the Automatic Stay, and Motion for Costs and/or

Sanctions. Respondent filed all three of his above Motions on February 22, 2022. The current deadline to respond to all three Motions is March 4, 2022.

This extension is requested due to Appellants' counsel's work load and the fact that Respondent simultaneously filed three (3) separate Motions that all now have the same return deadline. Counsel is involved in several other heavily contested matters that have required significant time commitments. This is the first request for an extension of this deadline. Counsel for Respondent has not consented to this Motion. This Motion is made in good faith and not for the purpose of delay.

WHEREFORE, Appellants respectfully request a fourteen (14) day extension to file their Returns to Respondent's three pending Motions, up to and including March 18, 2022.

**MURPHY & GRANTLAND, P.A.**

  
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Everett A. Kendall, II, SC Bar No. 8450  
Murphy & Grantland, P.A.  
Post Office Box 6648  
Columbia, SC 29260  
(803) 782-4100  
*Attorneys for Appellants*

February 25, 2022  
Columbia, South Carolina

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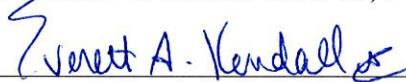
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and Legends Golf Holding, LLC are the Appellants.

**PROOF OF SERVICE**

I certify that I have served Appellants’ Motion for Extension of Time to File Returns on  
Respondent Gregory Cutlip by depositing a copy of it in the United States Mail, postage prepaid,  
on February 25, 2022, addressed to his attorney of record, Christopher T. Ramsey, 2236 Ashley  
Crossing Drive, Charleston, South Carolina 29414.

**MURPHY & GRANTLAND, P.A.**

Handwritten signature of Everett A. Kendall in blue ink, written over a horizontal line.

Everett A. Kendall, II, SC Bar No. 8450

Murphy & Grantland, P.A.

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Columbia, SC 29260

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*Attorneys for Appellants*

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Columbia, South Carolina