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Apr 11 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III

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Appellate Case No. 2022-000301

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Todd E. Taylor, Respondent,

v.

Amar and Kennie Gill Living Trust  
Dated March 15, 2019; Kennie Lee Miller Gill,  
Trustee of the Amar and Kennie Gill Living Trust  
Dated March 15, 2019; Kenneth V.L. Miller; and  
Anna M. Miller,

Appellants,

v.

South Beach Village Lagoon Villas, II,  
Horizontal Property Regime LVII,

Respondent.

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**MOTION FOR EXTENSION TO FILE AND SERVE APPELLANTS' RESPONSE TO  
MOTION TO DISMISS APPEAL**

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Appellants the Amar and Kennie Gill Living Trust Dated March 15, 2019, Kennie Lee Miller Gill, Trustee of the Amar and Kennie Gill Living Trust Dated March 15, 2019, Kenneth V.L. Miller, and Anna M. Miller respectfully request a fourteen-day (14) day extension of time in which to serve their *Response to the Motion to Dismiss Appeal* upon Respondents and file the same with the accompanying *Proof of Service* with the Court. Appellants' *Response* is due to be

served on Respondents' counsel, and an original Proof of Service filed with the Court, on or before April 11, 2022. Appellants move for the due date to be extended to April 25, 2022.

The undersigned seeks this extension due to settlement efforts of the parties and does so with consent of counsel for the Respondents, with whom she conferred prior to filing this Motion.

Respectfully submitted,

FINKEL LAW FIRM LLC

/s/ Magalie A. Creech (S.C. Bar 78855)  
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*Attorneys for Appellants*

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**PROOF OF SERVICE**

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I certify that on April 11, 2022, I served the *Motion for Extension to File and Serve Appellants' Response to Motion to Dismiss Appeal* by email to Respondents' counsel, pursuant to S.C. Supreme Court Order 2021-08-25-02, and by depositing a copy of same in the United States Mail, postage prepaid, addressed to Respondents' counsel as follows.

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*Attorneys for South Beach Village Lagoon Villas, II, Horizontal Property Regime LVII*

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*Attorneys for Appellants*



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REPLY TO:  
CHARLESTON LITIGATION

April 11, 2022

**Via Email To: ctappfilings@sccourts.org**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
**Apr 11 2022**  
**SC Court of Appeals**

RE: Todd E. Taylor vs. Amar and Kennie Gill Living Trust Dated March 15, 2019; Kennie Lee Miller Gill, Trustee of the Amar and Kennie Gill Living Trust Dated March 15, 2019; Kenneth V.L. Miller; and Anna M. Miller, et al.  
Appellate Case No.: 2020-CP-07-01547  
Our File No.: 90641.55746

Dear Ms. Kitchings:

Enclosed for filing please find the *Appellants' First Motion Requesting an Extension to File and Serve their Response to the Motion to Dismiss Appeal*, together with the *Proof of Service*, in the above-referenced matter. Kindly return a filed copy to me via email at mcreech@finkellaw.com.

A copy of the enclosures has been served on Respondents' counsel by email and regular mail today, as referenced in the Proof of Service. We are additionally enclosing a check in the amount of \$50.00 for the filing fee. Please do not hesitate to let me know if you have any questions.

With kind personal regards, we are

Yours very truly,

FINKEL LAW FIRM

*/s/ Magalie A. Creech*

Magalie A. Creech

CC: Douglas W. MacKelcan, Lacey L. Houghton  
Edward M. Kubec

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