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**Apr 25 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Master in Equity

Marvin H. Dukes, III, Master in Equity  
Case No: 2020-CP-07-01547

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Appellate Case No. 2022-000301

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Todd E. Taylor .....Respondent,

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..... Appellants,

vs.

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

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APPELLANTS’ SECOND MOTION FOR EXTENSION OF TIME  
TO RESPOND TO RESPONDENT’S MOTION TO DISMISS

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Appellants, 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, under Rule 263, SCACR, respectfully request an additional fourteen (14) day extension to submit a response to the Respondents’ Motion to Dismiss their appeal.

This motion is based on the following facts and argument.

Appellants' Notice of Appeal was filed March 15, 2022. Respondent, South Beach Village Lagoon Villas, II, Horizontal Property Regime, LVII (HPR), filed a Motion to Dismiss on March 31, 2022. On April 11, 2022, Appellants moved for a fourteen (14) day extension to file a Response to the Motion to Dismiss, that motion being granted by order entered April 12, 2022. The present deadline to file a Response is April 25, 2022.

On April 22, 2022, Appellants' counsel and her former law firm moved to be relieved as counsel with the undersigned and his law firm being substituted as counsel. The undersigned has also noted his appearance as counsel for the Appellants.

Because of the pending motion of Appellants' original counsel to be relieved, the simultaneous appearance of the undersigned as Appellants' counsel, and the need for the undersigned to review and adequately respond to the Motion to Dismiss, Appellants respectfully request an additional fourteen (14) day extension to file their Response.

If this extension is granted, Appellants' response will be due to be filed no later than May 9, 2022.

This Motion is not interposed for purposes of unnecessarily delaying the disposition of the Motion to Dismiss or this appeal generally. Appellants are informed their original counsel has left the private practice of law, necessitating they seek alternative counsel.

The undersigned is informed Respondent HPR does not consent to the relief requested. As soon as the position of Respondent Todd E. Taylor regarding the relief requested is ascertained, the undersigned will inform the Court.

Respectfully submitted,

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